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VIA HAND DELIVERY

REC'D TN
REGULATORY AUTH.

SEP 12 PM 3 06
September 13, 2000

OFFICE OF THE
EXECUTIVE SECRETARY

Guy M. Hicks
General Counsel

615 214-6301
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David Waddell, Executive Secretary
Tennessee Regulatory Authority
460 James Robertson Parkway
Nashville, TN 37238

Re: *Third Party Testing of BellSouth OSS*
Docket No. 99-00347

Dear Mr. Waddell:

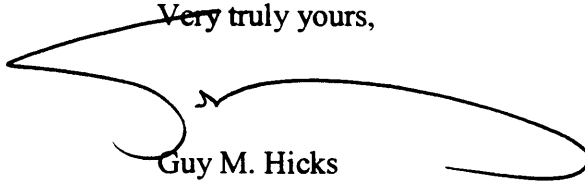
Enclosed please find fourteen copies of the following documents which have been filed with the Georgia Public Service Commission ("GPSC").

<u>Date Filed</u>	<u>Description of Document(s)</u>
8/16/00	BellSouth Amended Response to Exception 67; Second Amended Responses to Exceptions 62, 63, 90 and 93; and Fourth Amended Response to Exception 52
8/16/00	KPMG Exceptions 101 through 105; BellSouth Responses to Exceptions 102 and 105 and Statements of Investigation for Exceptions 101, 103 and 104
8/25/00	KPMG Closure Reports for Exceptions 1, 41 and 82
8/25/00	BellSouth Response to Exception 103; Amended Response to Exceptions 35, 73, 80 and 94; Second Amended Response to Exceptions 35, 76, 91 and 100; Fourth Amended Response to Exception 27 and Fifth Amended Responses to Exceptions 16, 52, 89, and 92
08/25/00	KPMG Amended Exception 79; KPMG Exceptions 106 through 109 and BellSouth Responses thereto; BellSouth Amended Response to Exception 107

David Waddell, Executive Secretary
September 13, 2000
Page 2

Copies of the enclosed are being provided to counsel of record for all parties.

Very truly yours,

A handwritten signature in black ink, consisting of a large, sweeping loop that starts under the word "yours," and extends to the right, ending under the name "Guy M. Hicks".

Guy M. Hicks

GMH:ch

CERTIFICATE OF SERVICE

I hereby certify that on September 13, 2000, a copy of the foregoing document was served on counsel for the petitioner and the entities seeking intervention, via the method indicated, addressed as follows:

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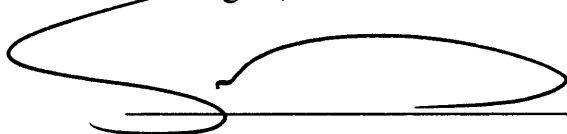
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RECEIVED

AUG 16 2000

EXECUTIVE SECRETARY
G.P.S.C.

August 16th, 2000

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue SW, Room 520
Atlanta, GA 30334

**RE: Investigation into Development of Electronic Interfaces for BellSouth's
Operational Support Systems; Docket No. 8354-U**

Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of BellSouth's Amended Response to Exception 67, Second Amended Responses to Exceptions 62, 63, 90 and 93, and Fourth Amended Response to Exception 52 for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,

David Frey
Manager

Enclosures

cc: Parties of Record



BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 67



June 16, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Order Functional Tests (O&P-1 and O&P-2).

Exception

BellSouth does not deliver timely Missed Appointment (MA) notices via the EDI and TAG interfaces.

In response to a CLEC's valid Local Service Request (LSR), BLS delivers a Firm Order Confirmation (FOC). The FOC provides: 1) confirmation that the service request has been validated; 2) notification of BellSouth's internal service order(s) generated to work the request; and 3) verification of the order's confirmed due date (DD).

In the event an order is unable to be provisioned on its DD as a result of either BellSouth or CLEC action, BLS sends an MA notice to the CLEC. According to BLS documentation, this file should include an MA code (e.g., 'SR') and description (e.g., 'Subscriber/End User Not Ready'). BLS documentation also indicates the CLEC activity required in response to each MA status (e.g., 'Supplemental service request required for new Due Date').¹

For purposes of this evaluation, KPMG has proposed a benchmark for MA response timeliness of one business day after the FOC DD². Of the 31 total MAs received:

- 77% (24 of 31) were received within one business day after the DD.
- 13% (4 of 31) were received later than one business day after the DD.
- 10% (3 of 31) were received *earlier* than the FOC DD³.

The following table provides a summary of MA response timeliness.

¹ BellSouth Pending Order Status Job Aid, November 19, 1998. BellSouth plans to update this documentation on June 30, 2000 to better define the process for transmitting Missed Appointment notices.

² A BellSouth-proposed or Georgia Public Service Commission-accepted standard for MA timeliness does not currently exist. In the absence of a published standard, KPMG has identified a benchmark based on its professional judgement to be used during this evaluation.

³ Receipt of MA notices, designed to notify a CLEC of provisioning activity that has been unsuccessful on the confirmed DD, prior to the actual DD indicates a potential provisioning problem. These PONs have been referred to the Provisioning Verification team (O&P-5) for additional investigation.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 67

MA Timeliness

PON	VER	CC	Order Type	FOC DD	MA Rcvd	Interval
350A212PEI100003	02	7050	BV	03/16/00	03/14/00	2 days before DD
359A112PTI100002	03	8758	BV	02/29/00	02/28/00	1 day before DD
422A114PEJ101001	03	9994	MA	02/18/00	02/17/00	1 day before DD
315A212PEH100024	05	9994	AC	03/15/00	03/15/00	Same day
349A212PEI000001	00	7050	BV	01/27/00	01/27/00	Same day
349A212PEI000004	02	7050	BV	02/23/00	02/23/00	Same day
350A112PTI100001	03	8758	BV	03/01/00	03/01/00	Same day
350A112PTI100001	04	8758	BV	03/15/00	03/15/00	Same day
359A112PEI100005	00	7050	BV	02/28/00	02/28/00	Same day
359A212PEI100002	01	8758	BV	03/06/00	03/06/00	Same day
359A212PEI100002	00	8758	BV	02/24/00	02/24/00	Same day
433A124PEJ100003	00	9991	MM	12/30/99	12/30/99	Same day
350A122PTI100001	00	7727	BV	02/04/00	02/04/00	Same day
350A122PTI100002	02	8758	BV	02/25/00	02/25/00	Same day
350A122PTI100002	03	8758	BV	03/02/00	03/02/00	Same day
351A212PTI000001	01	8758	BV	03/01/00	03/01/00	Same day
351A212PTI000001	02	8758	BV	03/10/00	03/10/00	Same day
353A222PTI000001	04	8758	BV	02/25/00	02/25/00	Same day
350A212PEI100003	00	7050	BV	02/25/00	02/25/00	Same day
350A212PEI100003	01	7050	BV	03/06/00	03/06/00	Same day
349A212PEI000004	04	7050	BV	03/06/00	03/06/00	Same day
353A222PTI000001	05	8758	BV	03/03/00	03/03/00	Same day
801A222PTI100006	00	7125	BW	03/09/00	03/09/00	Same day
353A222PEI000002	06	7727	BV	4/25/00	4/25/00	Same day
301A222PTH103001	11	9994	AA	4/14/00	4/14/00	Same Day
301A112PTH100009	03	9994	AA	03/03/00	03/17/00	10 days after DD ⁴
359A112PTI100002	04	8758	BV	03/02/00	03/03/00	1 day after DD
303A222PEH101001	03	9994	AA	02/29/00	03/03/00	3 days after DD
801A222PTI100006	01	7125	BW	3/20/00	3/23/00	3 days after DD
349A212PEI000001	01	7050	BV	03/06/00	03/17/00	9 days after DD
311F212PEH100002	00	9994	AV	01/27/00	02/15/00	13 days after DD

Impact

⁴ A Plant Facilities (PF) notice was received via FAX on 3/7 and 3/13 for this order. The second PF notice provided a new Due Date of 3/17. Therefore, the MA for this order was received on the same day as the latest confirmed DD, and has been counted as "on time" for purposes of this evaluation.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 67

Missed Appointment notices that are not delivered on a timely basis impact CLECs in the following way:

- **Decrease in customer satisfaction.** Receipt of a timely Missed Appointment notice is an essential step in the ordering and provisioning process. For missed due dates resulting from a subscriber or end-user error, an MA triggers the CLEC to submit a supplemental service request to request a new due date. An untimely MA notice delays this service order process and ultimately postpones end user service delivery. Service provisioning delays will result in a decrease in CLEC customer satisfaction.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 67

BellSouth Response

In accordance with BellSouth's processes, the missed appointment notice is delivered to the CLEC when the service order is placed in a missed appointment status and a subsequent due date is not simultaneously established. . If the customer negotiates a new due date prior to or without the service order being placed in a missed appointment status in SOCS, the missed appoint notice transaction is not sent.

Further, BellSouth delivers Pending Order Status for due date delays due to subscriber/end user reasons within 24 hours of the missed appointment status condition if a subsequent due date is not simultaneously established.

The Pending Order Status Job Aid on the BellSouth web site was enhanced on 6/13/00 to provide additional clarification.

The PONs provided in this draft exception were several months old. The service order history has purged and some PONs were canceled by KPMG making investigation difficult.

BellSouth investigated details of the 9 PONs in question with the follow results.

- 6 no problem found, notification appropriately sent
- 2 unable to determine if a problem exists due to the length of elapsed time
- 1 possible KPMG problem, failed to activate TAG Listener

The KPMG proposed benchmark of one business day after the FOC DD, in the opinion of BellSouth, does not take into account missed appointment conditions that may occur prior to or after the FOC DD based on the needs of the CLEC (e.g., end user or CLEC will not be ready on scheduled due date). BellSouth notifies CLECs of a missed appointment status condition whenever it occurs, including prior to the FOC DD.

BellSouth recommends closing this exception based on KPMG's misunderstanding of missed appointment notices via the EDI and TAG interfaces. In addition, findings of PONs provided do not indicate a BellSouth problem exists.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 67

PON	VER	CC	Order Type	FOC DD	Jeop. Rcvd	Interval	BellSouth Response
350A212PEI100003	02	7050	BV	03/16/00	03/14/00	2 days before DD	No problem found. Missed for subscriber reason without new due date being made on 3/14. Notification sent.
359A112PTI100002	03	8758	BV	02/29/00	02/28/00	1 day before DD	No problem found. Missed for subscriber reason without new due date being made on 2/28. Notification sent.
422A114PEJ101001	03	9994	MA	02/18/00	02/17/00	1 day before DD	No problem found. Missed for subscriber reason without new due date being made on 2/17. Notification sent.
303A222PEH10100 1	03	9994	AA	02/29/00	03/03/00	3 days after DD	No problem found. Missed for subscriber reason and new due date made on 2/29. Notification not applicable. Missed for subscriber reason without new due date being made on 3/3. Notification sent.
801A222PTI100006	01	7125	BW	3/20/00	3/23/00	3 days after DD	Possible KPMG problem, failed to activate TAG Listener.. Missed for subscriber reason and new due date made on 3/9. Notification not applicable. Missed for subscriber reason without new new due date being made on 3/20. Notification sent.
349A212PEI000001	01	7050	BV	03/06/00	03/17/00	9 days after DD	Unable to determine if problem exists. Service order history purged and order was canceled.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 67

PON	VER	CC	Order Type	FOC DD	Jeop. Rcvd	Interval	BellSouth Response
301A112PTH10000 9	03	9994	AA	03/03/00	03/17/00	10 days after DD	<p>No problem found.</p> <p>Order was PF'd on 3/2. New due date of 3/17 was made.</p> <p>Missed for subscriber reason without new due date being made on 3/17. Notification sent.</p>
301A222PTH10300 1	11	9994	AA	03/03/00	3/17/00	10 days after DD	<p>No problem found.</p> <p>This VER had due date 4/14.</p> <p>Missed for subscriber reason without new due date being made on 4/14. Notification sent.</p>
311F212PEH100002	00	9994	AV	01/27/00	02/15/00	13 days after DD	<p>Unable to determine if problem exists. Service order history purged.</p> <p>Missed for subscriber reason without new due date being made on 1/27. Notification was sent on 2/15.</p>

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 62



August 4, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measurement testing associated with the validation of service quality measurement (SQM) calculations.

Exception:

KPMG cannot replicate four of BellSouth's Service Quality Measurements (SQMs) in the February 2000 report.

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports¹.

As part of the BellSouth-Georgia OSS Evaluation, KPMG is attempting to replicate these reports (i.e., achieve exactly the same results as reported by BellSouth). To complete validation of the calculations, KPMG has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, and the corresponding raw data,² along with technical assistance from BellSouth when necessary.

KPMG experienced replication problems for the following SQMs in the February 2000 report.

1. ***Firm Order Confirmation Timeliness in the Ordering category for the KPMG Test CLEC.*** KPMG was unable to replicate values from the Fully Mechanized and Non-Mechanized SQM reports, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
Fully Mechanized; OCN = 9994; Product = Other; LSR Count (0-15)	1	2
Fully Mechanized;	9.09%	18.18%

¹ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) Web site.

² The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding raw data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The manual is posted and updated on the PMAP site.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 62

Category	KPMG Calculation	BellSouth Report
OCN = 9994; Product = Other; % 0-15 minutes		
Fully Mechanized OCN = 9994 Product = Other LSR Count (15-30)	7	6
Fully Mechanized OCN = 9994 Product = Other % 15-30 minutes	63.64%	54.55%
Total Mechanized OCN = 9994 Product = Other LSR Count (0-15)	1	2
Total Mechanized OCN = 9994 Product = Other % 0-15 minutes	4.17%	8.33%
Total Mechanized OCN = 9994 Product = Other LSR Count (15-30)	7	6
Total Mechanized OCN = 9994 Product = Other % 15-30 minutes	29.17%	25.00%

2. *Order Completion Interval* in the Provisioning category for the KPMG Test CLEC. KPMG was unable to replicate the following values in the BellSouth SQM report. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch Total Orders 20-25 Days	0	1
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 0-5 Days	50.0%	45.5%

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 62

Category	KPMG Calculation	BellSouth Report
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 5-10 Days	50.0%	45.5%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 20-25 Days	0.0%	9.1%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch Average Interval (Days)	4.13	5.76

3. *Total Service Order Cycle Time in the Provisioning category for the KPMG Test CLEC.* KPMG was unable to replicate the following values in the Non-Mechanized report, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 0-5 Days	12.5%	16.7%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 5-10 Days	75.0%	83.3%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch % 20-25 Days	12.5%	0.0%
OCN = 9991 UNE Non-Design < 10 Circuits Non-Dispatch Average Interval (Days)	9.13	7.17

4. *Invoice Accuracy in the Billing category for the KPMG Test CLEC.*

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 62

KPMG was unable to replicate any of the BellSouth reported SQM values. The discrepancies are shown in the following table.

Category	KPMG Calculation	BellSouth Report
UNE Total Billed Revenue	\$20,691.58	\$62,556.44
UNE Total Adjustments	\$43,152.09	\$64,084.52
UNE % Accuracy	-108.5%	-2.4%
Interconnection Total Billed Revenue	\$5,952.58	\$6,030.44
Interconnection Total Adjustments	0	\$38.93
Interconnection % Accuracy	100.0%	99.4%
Total Total Billed Revenue	\$113,427.39	\$155,370.11
Total Total Adjustments	\$208,405.753	\$229,377.11
Total % Accuracy	-83.7%	-47.6%

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. KPMG's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the four applicable SQMs may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

BellSouth Response

1. Firm Order Confirmation Timeliness in the Ordering category for the KPMG Test CLEC.

BellSouth agrees that KPMG was unable to replicate the BellSouth reported SQM for *FOC Timeliness* for the KPMG Test CLEC for February 2000. Upon further investigation, BellSouth identified a problem in the interval "buckets". The difference between KPMG's numbers and PMAP's numbers can be attributed to the LSRs FOC'd (orders confirmed) in the 15th minute. KPMG was putting those LSRs in the 15-30 minute "bucket" while PMAP was including them in the 0-15 minute "bucket".

As a result of this KPMG draft exception, System Change Request 5848 was opened to clarify the bucket definitions and was effective for March data.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 62

The *FOC Timeliness* for the May report had to be rerun because prior to May, two pieces of code were designed to exclude non-mechanized LSRs, which were received and/or processed on weekends. Although the first piece of code was correctly rewritten to exclude appropriate weekend hours, the second was overlooked and LSRs received and/or processed on weekends continued to be excluded. The code was corrected and the report was rerun on July 27. Notification that May Ordering Reports had been rerun was posted to the Web on August 1, 2000. The July SQM further clarified the issue regarding the appropriate bucket for 15 minute FOCs.

BellSouth provided KPMG with *FOC Timeliness* data for May and June 2000 for retesting.

2. Order Completion Interval in the Provisioning category for the KPMG Test CLEC.

BellSouth agrees that using the current raw data users manual, KPMG is unable to replicate the data in the above table. Currently, the instructions to create the Order Completion Interval report using the exclusion "so_cmtt_cd = 'L'" will not yield results identical to the SQM reports. The SQM report performs additional exclusions, permitting supplementary "L" orders into the final report. Specifically, "L" orders with commitment dates from prior months are not being excluded. The raw data users manual instructions are correct. BellSouth provided additional instructions in a raw data query that should enable KPMG to duplicate the data referenced in this exception.

BellSouth has issued a system change request # 5330 that addresses the issue of exclusion of "so_cmtt_cd = 'L'" and is scheduled to be effective for April data that will be published in May. The change will exclude the supplementary "L" orders from being included in the SQM report. This change will enable the monthly reports to match results created using the Raw Data Users Manual.

3. Total Service Order Cycle Time in the Provisioning category for the KPMG Test CLEC

BellSouth agrees that using Version 2.0 of the Raw Data users manual, KPMG is unable to replicate the Total Service Order Cycle Time for the KPMG Test CLEC as indicated in the above data for OCN 9991.

The instructions in the Manual utilized to perform the data replication, specifically the exclusion of records where "so_cmtt_cd = null", by grouping fields to eliminate duplicate records needs some additional clarification. BellSouth provided additional instructions in a raw data query that enabled KPMG to duplicate the data referenced in this exception. The Raw Data Users Manual was updated in June, to reflect changes made to ensure that duplicate records were eliminated and additional process steps were added to ensure that the reports could be duplicated.

4. Invoice Accuracy in the Billing category for the KPMG Test CLEC.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 62

For Invoice Accuracy in the Billing Category for the KPMG Test CLEC, KPMG compared their calculations to the PMAP results. BellSouth used KPMG's comparisons to evaluate why the replication cannot be done on this measure. BellSouth evaluation of the data reveals that there are some OCNs and ACNAs on the BBI data that KPMG did not include in their calculations. Those OCNs / ACNAs that are not in KPMG's data are also the same ones that are not on the CLECID file in their comparison. If those OCNs / ACNAs were added into KPMG's data, the KPMG and Billing data figures would be the same. After review of the PMAP revenue amounts (and excluding the revenue amounts without OCN / ACNAs values in PMAP), the difference is that PMAP used the absolute value of the total billed revenue for UNE and Interconnection.

On 6/22/00 KPMG requested a copy of the rerun results for February 2000 data for Invoice Accuracy. BellSouth has provided KPMG with an electronic copy of the NODS_RQ Company file for February 2000 on 6/22/00. BellSouth provided KPMG with the DSS Agent report for February 2000.

The differences in the data that Billing reported versus the figures that PMAP reported were due to PMAP handling of the negative revenues and the fact that the February 2000 NODS_RQ Company file did not include some of the test accounts or ICOs. If KPMG excludes the fall out of the test accounts and ICOs from the totals, the results would be the same as reported in PMAP. In summary, if 'fallout' from PMAP is determined to be 'BellSouth test data' or BellSouth accounts that have not been identified as a valid CLEC, PMAP will exclude it from the final reports.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 63



August 7, 2000

EXCEPTION REPORT

An exception has been identified as a result of the TAG Pre-Order Functional Test (PRE-1) and the TAG Documentation Evaluation (PRE-3).

Exception:

KPMG discovered numerous inconsistencies between BellSouth's *TAG API Guide, Version 2.2.0.5* and *Pre-Order Business Rules, Version 3.0* document.

BellSouth currently supports multiple versions of the TAG pre-order interface. When a new version of TAG is released, BellSouth continues to support the previous version(s) of TAG for a certain period of time to allow CLECs the opportunity to upgrade their systems¹. For new versions of TAG BellSouth publishes a *TAG API Guide*, when necessary, which provides the technical specifications for TAG interface development or update by CLECs.

To facilitate pre-order submission via the TAG interface, BellSouth provides CLECs with a *Pre-Order Business Rules* document. This document lists and defines the data elements for each pre-order query and response, including usage and formatting requirements, and in some cases, valid entries. Certain data elements outlined in the *Pre-Order Business Rules* apply only to one specific version of TAG. The *Pre-Order Business Rules* do not define, for each data element or query type, the corresponding TAG release.

As part of testing activities, KPMG performed a review of the *TAG API Guide, Version 2.2.0.5*² and the *Pre-Order Business Rules, Version 3.0*. KPMG discovered numerous inconsistencies between the data elements found in the *TAG API Guide* and those included in the *Pre-Order Business Rules*. These inconsistencies fall into two categories:

1. A data element appears in the *TAG API Guide*, but not in the *Pre-Order Business Rules*.
2. A data element appears in the *Pre-Order Business Rules* but not in the *TAG API Guide*.

The following table provides a sample of these inconsistencies:

¹ The number of versions of TAG and the time period of support for previous versions vary based on the size of the release and other factors.

² KPMG used TAG, Version 2.2.0.5 through March 8, 2000.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 63

Query or Response Type	Query or Response Description	Data Element	Data Element in TAG API Guide but not in Pre-Order Business Rules	Data Element in Pre-Order Business Rules but not TAG API Guide	BellSouth Response
AVR	Address Validation Response: Single Address Verified	TRX-PURPOSE (Re-send Indicator)		X	The field is not present in the TAG interface software and as such the field should have and will be removed from the Pre-Order Business Rules.
AVR	Address Validation Response: Single Address Verified	HOUSENUMPREFIX	X		The field is not present in the TAG interface software and as such the field should and will be removed from the API Guide.
AVR	Address Validation Response: Single Address Verified	ADDRESSPATTERN	X		The reference to the field in the API Guide is appropriate and as such should have and will be added to the Pre-Order Business Rules.
AVR	Address Validation Response: Single Address Verified	ELEVATIONPATTERN	X		The reference to the field in the API Guide is appropriate and as such should have and will be added to the Pre-Order Business Rules.
AVR	Address Validation Response: Single Address Verified	UNITPATTERN	X		The reference to the field in the API Guide is appropriate and as such should have and will be added to the Pre-Order Business Rules.
TNAR-TN	Telephone Number Assignment – General Pool TNs	QTY Requested		X	The field is not present in the TAG interface

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 63

Query or Response Type	Query or Response Description	Data Element	Data Element in TAG API Guide but not in Pre-Order Business Rules	Data Element in Pre-Order Business Rules but not TAG API Guide	BellSouth Response
					software and as such the field should have and will be removed from the Pre-Order Business Rules.
TNAR-TN	Telephone Number Assignment – General Pool TNs	QTY Provided		X	The Pre-Order Business Rules will be clarified to state that in TAG, the quantity provided is returned as a function rather than as a discreet variable.
TNAR-DID	Telephone Number Assignment – Direct In Dial TNs	QTY Requested		X	The field is not present in the TAG interface software and as such the field should have and will be removed from the Pre-Order Business Rules.
TNAR-MLH	Telephone Number Assignment – Multi Line Hunt TNs	QTY-IN-TER		X	The Pre-Order Business Rules will be clarified to state that in TAG, the quantity provided is returned as a function rather than as a discreet variable.
TNAR-MLH	Telephone Number Assignment – Multi Line Hunt TNs	QTY-OUT-TER		X	The Pre-Order Business Rules will be clarified to state that in TAG, the quantity provided is returned as a function rather than as a

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 63

Query or Response Type	Query or Response Description	Data Element	Data Element in TAG API Guide but not in Pre-Order Business Rules	Data Element in Pre-Order Business Rules but not TAG API Guide	BellSouth Response
					discreet variable.
AAR	Appointment Availability Response	LSO-NPA-TTA		X	The field is not present in the TAG interface software and as such the field should have and will be removed from the Pre-Order Business Rules.
CDD	Calculate Due Date	All Data Elements	X		This field is in Version 3.0 of Pre-Order Business Rules for OSS99 and therefore the two documents are consistent.
TNAQ_MISC	Miscellaneous TN Assignment Query	All Data Elements		X ³	This field is in Version 3.0 of Pre-Order Business Rules for OSS99 and therefore the two documents are consistent.
TNAR_MISC	Miscellaneous TN Assignment Response	All Data Elements		X ³	This field is in Version 3.0 of Pre-Order Business Rules for OSS99 and therefore the two documents are consistent.

Impact:

Inconsistencies between BellSouth's *TAG API Guide* and *Pre-Order Business Rules* will affect CLECs in the following ways:

Increased operating costs. Consistency between BellSouth's *TAG API Guide* and *Pre-Order Business Rules* is necessary for a CLEC to successfully create and employ a TAG

³ BellSouth issued a Carrier Notification (SN91081657) on February 17, 2000 to announce the *Pre-Order Business Rules, Version 3.0*. This Notification indicated that the TNAQ-MISC and TNAR-MISC query types were implemented with OSS'99 (TAG, Version 3). This fact is not reflected in the *Pre-Order Business Rules*.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 63

interface. Inconsistency will increase the resources required to submit pre-order queries and interpret responses.

Decreased customer satisfaction. Delays in pre-order activities resulting from these inconsistencies.

Additional BellSouth Response

The Pre-Order Business Rules was developed as a generic document to support LENS, TAG and RoboTAG interfaces. The API Guide is specific to TAG. The Pre-Order Business Rules will be updated by 6/5 to reference applicable interfaces, e.g. LENS, TAG and to address the issues identified in this exception.

The HOUSENUMPREFIX data element is not valid and will be removed from the API Reference Guides 2.2.0.10 (Issue 7) and 7.1.1 (Issue 9). The guides will be posted on the Interconnection website on 7/14/00. Older versions of the API reference guide will not be updated since they are scheduled to be removed from the website in the near future.

The TAG-API Reference Guide consists of several fields that are defined in multiple structures because the TAG API uses the same structure for input and output due to design issues. This would, in effect, cause the API Reference Guide and the Pre-Order Business Rules document to appear to have conflicts, when in fact due to design consideration each individual field does match. This is common when transitioning from logical modeling of an application system to the physical design used to implement a system.

BellSouth will document the correlation between the API Reference Guide and Pre-Order Business Rules by matching the TAG fields with the business rules and the usage along with the with the inputs and outputs. Below is an example:

TAG API XXX Specification Pre Order Business Function XXX

Description: _____

Structure Name: Address

TAG Field	Pre-order B.R.	R/C/O/N	I/O	Comments
HouseNumberPrefix		R	I	Schedule for removal from July 14 API Guide release
HouseNumber	HOUSE-NUM	O	I	
HouseNumberSuffix	HOUSE-NUM-SUFFIX	O	I	
StreetDirectional	STREET-DIR	O	I	
StreetThoroughfare	THOUGHFARE	O	I	

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 63

StreetName	STREET-NAME1	O	I	
StreetSuffix	STREET-SUFFIX	O	I	
Room	UNIT-ROOM	O	I	
Building	STRUC-BLDG	O	I	
Floor	ELEV-FLOOR	O	I	
DescriptiveLocation	DESC-LOC	O	I	
City	CITY	C	I	
State	STATE	C	I	
Zipcode	ZIP-CODE	C	I	
UnnumberedHouse	UNNUM-HOUSE-IND	O	I	
CrossBoundary	CROSSBOUNDARYSTATE	O	I	
PostalBox	BOX	O	I	
Route	ROUTE	O	I	
RateZone		N	O	
DriveInstruction		N	O	
CompanyIndicator		N	O	
AddressPatternList		N	O	

R – Required

C - Conditional

O – Optional

N – Not used in either query or response

All structures would be included in the requirements. A change control will be issued and an implementation date will be negotiated.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 90



August 4, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measurement testing associated with the validation of Service Quality Measurement (SQM) calculations.

Exception:

KPMG cannot replicate three of BellSouth's reported Service Quality Measurements (SQMs) in the March 2000 performance measurement reports.

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports¹.

As part of the BellSouth-Georgia OSS Evaluation, KPMG is attempting to replicate these reports (i.e., achieve exactly the same results as reported by BellSouth). To complete validation of the calculations, KPMG has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, and the corresponding raw data,² along with technical assistance from BellSouth.

KPMG has been unable to replicate the following SQM values for the KPMG CLEC for the month of March:

1. **Ordering - Firm Order Confirmation Timeliness.** KPMG was unable to replicate the BellSouth reported values for the Residence product level for the Fully Mechanized and the Total Mechanized reports.

Category	KPMG Calculations	BellSouth's Report
Total Mechanized; OCN 9992; Residence; LSR Count 0-15	0	1
Total Mechanized; OCN 9992; Residence; 0-15 Min	0.00%	5.26%
Total Mechanized; OCN 9992; Residence; LSR Count 15-30	15	14
Total Mechanized; OCN 9992; Residence; 15-30 Min	78.95%	73.68%
Fully Mechanized; OCN 9992;	0	1

¹ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) web site.

² The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding raw data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The Manual is posted and updated on the PMAP site.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 90

Residence; LSR Count 0-15		
Fully Mechanized; OCN 9992; Residence; 0-15 Min	0.00%	5.26%
Fully Mechanized; OCN 9992; Residence; LSR Count 15-30	15	14
Fully Mechanized; OCN 9992; Residence; 15-30 Min	78.95%	73.68%

2. **Provisioning - Order Completion Interval.** For the UNE Dispatch report, KPMG was unable to replicate the UNE Non-Design product level, using BellSouth's instructions.

Category	KPMG Calculations	BellSouth's Report
UNE Non-Design; OCN 9994; < 10 Circuits; Dispatch; Total Orders 5-10 Days	1	2
UNE Non-Design; OCN 9994; < 10 Circuits; Dispatch; 5-10 Days	33.33%	40.00%
UNE Non-Design; OCN 9994; < 10 Circuits; Dispatch; Average Interval (Days)	12.0	11.4
UNE Non-Design; OCN 9994; ≥ 10 Circuits; Dispatch; Total Orders 5-10 Days	0	1
UNE Non-Design; OCN 9994; ≥ 10 Circuits; Dispatch; 5-10 Days	0.00%	33.33%
UNE Non-Design; OCN 9994; ≥ 10 Circuits; Dispatch; 15-20 Days	100.00%	66.67%
UNE Non-Design; OCN 9994; ≥ 10 Circuits; Dispatch; Average Interval (Days)	19.00	15.67

3. **Provisioning - Coordinated Customer Conversions.** KPMG was unable to replicate the following BellSouth reported values.

Category	KPMG Calculations	BellSouth's Report
Without Number Portability; Count ≤ 5	29	40
Without Number Portability; % ≤ 5	85.29%	88.89%
Without Number Portability; 5 > % ≤ 15	14.71%	11.11%
Without Number Portability; Total Count	34	45
Without Number Portability; Total Minutes	158	161
Without Number Portability; Average Interval (Minutes)	4.65	3.58

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 90

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. KPMG's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the three applicable SQMs may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

BellSouth Response

1. Ordering - Firm Order Confirmation Timeliness

BellSouth identified a problem in the interval "buckets". The difference between KPMG's numbers and PMAP's numbers can be attributed to the LSRs FOC'd (confirmed) in the 15th minute. KPMG was putting those LSRs in the 15-30 minute "bucket" while PMAP was including them in the 0-15 minute "bucket".

As a Result of KPMG's Draft Exception 47, Change Request 5848 was opened to clarify the bucket definitions. The SQM dated May 2000 includes the "bucket" definition.

The *FOC Timeliness* for the May report had to be rerun because prior to May, two pieces of code were designed to exclude non-mechanized LSRs, which were received and/or processed on weekends. Although the first piece of code was correctly rewritten to exclude appropriate weekend hours, the second was overlooked and LSRs received and/or processed on weekends continued to be excluded. The code was corrected and the report was rerun on July 27. Notification that May Ordering Reports had been rerun was posted to the Web on August 1, 2000. The July SQM further clarified the issue regarding the appropriate bucket for 15 minute FOCs.

BellSouth has provided KPMG with *FOC Timeliness* data for May and June 2000 for retesting.

2. Provisioning - Order Completion Interval

BellSouth agrees that using the current raw data users manual KPMG is unable to replicate for the test CLEC the following data: for March 2000, the UNE Non-Design product for OCN 9994.

Currently, the instructions to create a report using the exclusion "so_cmmt_cd = 'L'" will not yield results identical to the SQM reports. The SQM report performs additional exclusions, permitting supplementary "L" orders into the final report. Specifically, "L" orders with commitment dates from prior months are not being excluded. BellSouth has issued a system change request # 5330 that addresses the issue of exclusion of "so_cmmt_cd = 'L'" and is scheduled to be effective for March data. This change, **which will cause supplementary L orders to be excluded from the report**, will enable the monthly reports to match results created using the Raw Data Users Manual.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 90

BellSouth will provide KPMG with the rerun March OCI report and KPMG will attempt to revalidate the report.

3. Provisioning - Coordinated Customer Conversions.

The file sent to KPMG for replication was the original raw data file from WFA-C and did not contain some additional data (Cut Start Minutes) that had to be obtained from CCSS. This accounts for one record included in the BellSouth report which was not included in the KPMG replication. Also, there was a miscalculation in the summation of the number of items by the KPMG replication process (items for 5 orders were not counted).

A copy of the file that BellSouth used to generate the report has been provided to KPMG. KPMG was informed of the miscalculation problem and the orders that were not included in the calculation.

KPMG will attempt to generate the report again using the new file provided and ensure that all items are included in the calculation. KPMG reported on 6/12/00 that they were able to replicate the Provisioning - *Coordinated Customer Conversions* metric for the BellSouth reported values.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 93



July 21, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Metrics Definition Documentation and Implementation Verification and Validation Review (PMR-2).

Exception:

KPMG encountered ten Service Quality Measurements ("SQMs") for which there are inconsistencies among the statements of the definition, calculation and business rules sections in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*.

SQMs are calculated to measure BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.¹

As part of the BellSouth-Georgia OSS Evaluation, KPMG is evaluating the accuracy, completeness and consistency of SQM definitions, calculations, and business rules in the *SQM Reports*.²

1. Ordering - Speed of Answer in Ordering Center - Local Carrier Service Center (LCSC)

Definition	Measures the average time a customer is in queue.
Calculation	(Total time in seconds to reach the LCSC) / (Total Number of Calls in the Reporting Period).

While the numerator of the documented calculation only takes into account answered calls (i.e., calls that reach the LCSC), the denominator includes both calls answered and calls abandoned.

¹ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) web site.

² KPMG used the *SQM Reports, Version 10/22/99* as a basis to perform this test. KPMG also took into consideration changes published in the *SQM Reports, Version 2/24/00*.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 93

2. Provisioning - *Mean Held Order Interval & Distribution Intervals.*

Definition	When delays occur in completing CLEC orders, the average period that CLEC orders are held for BST reasons, pending a delayed completion, should be no worse for the CLEC when compared to BST delayed orders.
Calculation	Mean Held Order Interval: $\Sigma (\text{Reporting Period Close Date} - \text{Committed Order Due Date}) / (\text{Number of Orders Pending and Past The Committed Due Date})$ for all orders pending and past the committed due date." Held Order Distribution Interval: $(\# \text{ of Orders Held for } \geq 90 \text{ days}) / (\text{Total } \# \text{ of Orders Pending But Not Completed}) \times 100$ $(\# \text{ of Orders Held for } \geq 15 \text{ days}) / (\text{Total } \# \text{ of Orders Pending But Not Completed}) \times 100$

While the title and definition of this SQM suggest that it is the average period that all CLEC orders are held, the calculation describes the average period held for CLEC orders still pending at the end of the reporting period. CLEC orders that were closed before the end of the reporting period are not accounted for in this SQM.

3. Provisioning - *Percent Missed Installation Appointments*

Calculation	$\Sigma (\text{Number of Orders Not Complete by Committed Due Date in Reporting Period}) / (\text{Number of Orders Completed in Reporting Period}) \times 100$
Business Rules	Percent Missed Installation Appointments is the percentage of total orders processed for which BST is unable to complete the service orders on the committed due dates...

While the business rules for this SQM refer to the percentage of orders processed, the denominator in the calculation description refers to the number of orders completed in the reporting period.

4. Maintenance and Repair - *Percent Repeat Troubles Within 30 Days*

Definition	Trouble reports on the same line/circuit as a previous trouble report received within 30 calendar days as a percent of total troubles reported.Closed
Calculation	[...] $(\text{Count of Customer Troubles where more than one trouble report was logged for the same service line within a continuous 30 days}) / (\text{Total Trouble Reports Closed in Reporting Period}) \times 100$

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While the documented definition describes this SQM as a percentage of total troubles reported, the denominator in the calculation refers to the total trouble reports closed in the reporting period.

5. Provisioning - Average Completion Notice Interval

Calculation	$\Sigma (\text{Date and Time of Notice of Completion}) - (\text{Date and Time of Work Completion}) / (\text{Number of Orders Completed in Reporting Period})$
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The denominator should be the number of orders for which completion notices were sent, rather than number completed. Since there is a time lag between completion and notification times, the number of orders completed during the reporting period may differ from the number of orders for which a notification of completion has been issued to the CLEC.

6. Billing – Invoice Accuracy

Calculation	$\text{Invoice Accuracy} = (\text{Total Billed Revenues during current month}) - (\text{Billing Related Adjustments during current month}) / \text{Total Billed Revenues during current month} \times 100$
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“Total Billed Revenues during current month” pertain to the current month's bills, while “Billing Related Adjustments during current month” pertain to bills from both current and previous months. These two components of the numerator refer to different and inconsistent sets of bills.

7. Billing – Usage Data Delivery Completeness

Definition	This measurement provides percentage of complete and accurately recorded usage data (usage recorded by BellSouth and usage recorded by other companies and sent to BST for billing) that is processed and transmitted to the CLEC within thirty (30) days of the message recording date. A parity measure is also provided showing completeness of BST messages processed and transmitted via CMDS. BellSouth delivers its own retail usage from recording location to billing location via CMDS as well as delivering billing data to other companies. Timeliness, Completeness and Mean Time to Deliver Usage measures are reported on the same report.
Calculation	$\text{Usage Data Delivery Completeness} = \Sigma(\text{Total number of Recorded usage records delivered during the current month that are within thirty (30) days of the message recording date}) / \Sigma(\text{Total number of Recorded usage records delivered during the current month}) \times 100$

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This calculation only measures timeliness of delivery of usage data. It does not measure completeness. Therefore, the title of the SQM and the reference to completeness in the definition are not reflected in the description of the calculation.

8. Billing – Mean Time to Deliver Usage

Definition	This measurement provides the average time it takes to deliver Usage Records to a CLEC. A parity measure is also provided showing timeliness of BST messages processed and transmitted via CMDS. Timeliness, Completeness and Mean Time to Deliver Usage measures are reported on the same report.
Calculation	Mean Time to Deliver Usage = Σ (Record volume X estimated number of days to deliver the Usage Record) / total record volume

This calculation is based on the “estimated number of days to deliver the Usage Record.” The reason for using an estimate and the exact nature of the estimate need to be explained.

9. Pre-Ordering and Maintenance & Repair – OSS Interface Availability

Pre-Ordering – OSS Interface Availability	
Calculation	(Functional Availability) / (Scheduled Availability) X 100
Business Rules	This measurement captures the availability percentages for the BST systems, which are used by CLECs during Pre-Ordering functions. Comparison to BST results allow conclusions as to whether an equal opportunity exists for the CLEC to deliver a comparable customer experience.

M&R – OSS Interface Availability	
Calculation	OSS Interface Availability = (Actual System Functional Availability) / (Actual planned System Availability) X 100
Business Rules	This measure is designed to compare the OSS availability versus scheduled availability of BST's legacy systems.

These calculation descriptions do not provide details regarding the calculation of functional availability and scheduled availability. Specifically, they do not indicate:

1. How the functional availability time period is determined or what time units are used for reporting;
2. Whether partial availability is included in functional availability;

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 93

3. What schedule is used for scheduled or planned availability.

10. Maintenance and Repair – *OSS Response Interval and Percentages*

Definition	The response intervals are determined by subtracting the time a request is received on the BST side of the interface until the response is received from the legacy system. Percentages of requests falling into each interval category are reported, along with the actual number of requests falling into those categories.
Calculation	$\text{OSS Response Interval} = (\text{Query Response Date and Time for Category "X"} - (\text{Query Request Date and Time for Category "X"})) / (\text{Number of Queries Submitted in the Reporting Period})$ where, "X" is 0-4, ≥ 4 to 10, ≥ 10 , ≥ 30 seconds.
Business Rules	This measure is designed to monitor the time required for the CLEC and BST interface system to obtain from BST's legacy systems the information required to handle maintenance and repair functions. The clock starts on the date and time when the request is received and the clock stops when the response has been transmitted through that same point to the requester.

The documented calculation of percentage of requests falling within specific interval categories is inaccurate because:

1. It refers to "OSS Response Interval."
2. It does not describe counting the number of queries for which response time falls within a specific category.

Moreover, the SQM title "OSS Response Interval and Percentages" suggests that Response Interval is reported in addition to the percentage of requests falling within specific categories, which is not the case.

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Impact

CLECs rely on BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. Accurate, complete and consistent SQM definitions, calculations and business rules are essential to the CLECs' ability to properly interpret and utilize these performance measurements.

BellSouth Response

1. Ordering - *Speed of Answer in Ordering Center – Local Carrier Service Center (LCSC)*

Abandoned calls are not included in the denominator. For clarification purposes, the SQM will be updated in the July version. For Speed of Answer in Ordering Center the Calculation will be: **(Total seconds in queue) / (Total number of calls answered in the reporting period)**

2. Provisioning - *Mean Held Order Interval & Distribution Intervals.*

The Calculation and Definition are scheduled to be corrected in the July 2000 SQM update as outlined in the response to Observation 26. The Calculation will read: **"Mean Held Order Interval: Σ (Reporting Period Close Date – Committed Order Due Date) / (Number of Past Due Orders Held and Pending but Not Completed and past the committed due date.)"**

Held Order Distribution Interval:

(# of Orders Held for ≥ 90 days) / (Total # of Past Due Orders Held and Pending But Not Completed) X 100

(# of Orders Held for ≥ 15 days) / (Total # of Past Due Orders Held and Pending But Not Completed) X 100"

The Definition will read: "When delays occur in completing CLEC orders, the average period that CLEC orders are held for BellSouth reasons, pending a delayed completion, should be no worse for the CLEC when compared to BellSouth delayed orders.

Calculation of the interval is the total days orders are held and pending but not completed that have passed the currently committed due date; divided by the total number of held orders. This report is based on orders still pending, held and past the committed due date at the close of the reporting period. The distribution interval is based on the number of orders held and pending but not completed over 15 and 90 days. (Orders reported in the >90 day interval are also included in the >15 day interval)."

Regarding the exception stated above, this measure is taken from LCUG Page 31 and the NPRM (FCC) page 31-Section E-65 where both state: Held Order Interval is designed to detect orders continuing in a non-completed state for an extended period of time. The NPRM states "measuring those orders whose due dates have passed, the Average Held

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Order measurement will capture those orders not covered by the Average Completion Interval measurement". Also, these orders are later measured in the Percent Missed Installation Appointment report to state the percentage of orders that were completed past their original committed due date.

3. Provisioning - *Percent Missed Installation Appointments*

The Calculation and Business rules will be updated in the next version of the SQM, currently scheduled for July 2000.

The Calculation will be: Σ (Number of Orders with Completion date in Reporting Period past the Original Committed Due Date) / (Number of Orders Completed in Reporting Period) X 100

The Business Rules will include the following statement: **Percent Missed Installation Appointments is the percentage of orders with completion dates in the reporting period that are past the original committed due date.**

4. Maintenance and Repair - *Percent Repeat Troubles Within 30 Days*

As noted in the response to Draft Exception 93, BellSouth will update the Definition, Calculation, and Business Rules in the next version of the SQM scheduled for July 2000. The updated definition will read: **Closed trouble reports received with 30 calendar days on the same line/circuit as a previous trouble report received as a percent of total troubles closed during the reporting period.**

The updated calculation will read: **(Closed trouble reports received with 30 calendar days on the same line/circuit as a previous trouble report received) / (Total trouble reports closed in the reporting period) X 100**

The updated Business Rules will read: **Closed customer troubles received within 30 days of an original closed customer trouble report.**

5. Provisioning - *Average Completion Notice Interval*

The Calculation will be updated in the next version of the SQM, currently scheduled for July 2000.

The Calculation will be: Σ (Date and Time of Notice of Completion) – (Date and Time of Work Completion) / (Number of Orders With Notices of Completion in Reporting Period)

6. Billing – *Invoice Accuracy*

Billing related adjustments that are used to calculate the Invoice Accuracy Measure are derived from any adjustments that are applied to the billing account during the report month. There are billing situations where adjustments are made to a customer's bill that reflects several prior months' bills. The measure captures the adjustments for the month

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in which the adjustment appears on the customer's bill however the adjustment amount may include corrections for several prior months. This measure was designed based on historical measurement calculations for other companies who consider the calculation satisfactory. Additionally, if adjustments for previous months were updated, continual revisions and updates of the Invoice Accuracy measure for prior months would be an ongoing requirement. The ability to report adjustments on the month that the charge appears is not feasible.

The wording in the July SQM will be changed to read: **"Total Billed Revenue reported during the current month"** and **"Billing Related Adjustments reported during the current month"**.

7. Billing – Usage Data Delivery Completeness

The Usage Completeness measure as established by long standing national standards is tracked through reporting the volume of message records sent to the CLEC within thirty days after the AMA-record is produced in the BellSouth Central Office. The number of records sent in the thirty day interval is expressed as a percentage of the total records sent. The established completeness target, for 98% of all usage to be delivered within thirty days, is included in many of the Local Interconnection contracts. Signed agreements between BellSouth Telecommunications Inc and Competitive Local Exchange Carriers include these calculations as defined for Completeness. The Usage Data Delivery Completeness measurement was defined based on the contract language of many of the negotiated CLEC contracts and is an accepted practice of reporting Usage Data Delivery Completeness.

8. Billing – Mean Time to Deliver Usage

The industry standard has been to compute delays in number of days for each message. Days_Delayed does not provide the exact period of time it took for that record volume to be delivered, therefore Messages that take less than 1 full day to be delivered to the CLEC are calculated with a weight_factor. Therefore, the days delayed is reported as estimated number of days to deliver the Usage Record.

9. Pre-Ordering and Maintenance & Repair – OSS Interface Availability

BellSouth will add the changes below to the July update to the SQM which will answer all of KPMG's concerns.

1. How the functional availability time period is determined or what time units are used for reporting; **The down time other than that scheduled is measured in hours and reported as a percent of the time scheduled.**
2. Whether partial availability is included in functional availability; **Any down time whether partial or not is considered not available.**
3. What schedule is used for scheduled or planned availability. **The scheduled availability is developed by the legacy system owner based on maintenance**

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requirements for that system. CLEC system availability is posted on the web at www.interconnection.bellsouth.com/oss/oss_hour.html.

In the OSS System Availability report, BellSouth will use a category of FULL OUTAGE as the indicator of the system being available.

*Will add this note to the Business rules section of the SQM.

Note: Only full outages are used in the calculation of Application Availability. A full outage is incurred when any of the following circumstances exist:

1. The application or system is down
2. The application or system is inaccessible, for any reason, by the customers who normally access the application or system.
3. More than one work center cannot access the application or system for any reason.
4. When only one work center accesses an application or system and 40% or more of the clients in that work center cannot access the application

The July SQM will be updated to reflect the following changes to the Calculation and Business Rules for *Pre-Ordering and Maintenance & Repair – OSS Interface Availability*

Pre-Ordering – OSS Interface Availability	
Calculation	$\text{OSS Interface Availability} = (\text{Actual System Functional Availability}) / (\text{Actual Planned System Scheduled Availability}) \times 100$
Business Rules	This measurement captures the availability percentages for the BST systems, which are used by CLECs during Pre-Ordering functions. Functional Availability is the amount of time in hours during the reporting period that the legacy systems are functionally available to users. The Planned System Scheduled Availability is the time in hours per day that the legacy system is scheduled to be available. Scheduled availability is posted on the ICS Operations internet site: (www.interconnection.bellsouth.com/oss/oss_hour.html).

M&R – OSS Interface Availability	
Calculation	$\text{OSS Interface Availability} = (\text{Actual System Functional Availability}) / (\text{Actual Planned System Availability}) \times 100$
Business Rules	This measure is designed to compare the OSS availability versus scheduled availability of BST's legacy systems. Functional Availability is the amount of time in hours during the reporting period that the legacy systems are functionally available to users. The Planned System Scheduled Availability

**BELLSOUTH'S SECOND AMENDED RESPONSE TO
EXCEPTION 93**

	is the time in hours per day that the legacy system is scheduled to be available. Scheduled availability is posted on the ICS Operations internet site (www.interconnection.bellsouth.com/oss/oss_hour.html).
--	--

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 93

10. Maintenance and Repair – *OSS Response Interval and Percentages*

BellSouth will add the changes below to the July update of the SQM.

The metric will be renamed: *OSS Response Percent within Interval*

Definition	The response intervals are determined by subtracting the time a request is received on the BST side of the interface until the response is received from the legacy system. Percentages of requests falling into each interval category are reported, along with the actual number of requests falling into those categories.
Calculation	$\text{OSS Response Interval} = (\text{Query Response Date and Time for Category "X"} - (\text{Query Request Date and Time for Category "X"})) / (\text{Number of Queries Submitted in the Reporting Period})$ where, "X" is 0-4, ≥ 4 to 10, ≥ 10 , and ≥ 30 seconds X100.
Business Rules	This measure is designed to monitor the time required for the CLEC and BST interface system to obtain from BST's legacy systems the information required to handle maintenance and repair functions. The clock starts on the date and time when the request is received and the clock stops when the response has been transmitted through that same point to the requester. The number of requests and the percent within interval is accumulated. Percentages of requests falling into each interval category are reported, along with the actual number of requests falling into those categories.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 52



August 4, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Metrics Calculation and Reporting Verification and Validation Review (PMR-5).

Exception:

KPMG cannot replicate twelve of BellSouth's reported Service Quality Measurements (SQMs).

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports¹.

As part of the BellSouth-Georgia OSS Evaluation, KPMG is attempting to replicate these reports (i.e., achieve exactly the same results as reported by BellSouth). For this purpose, KPMG has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, and the corresponding raw data,² along with technical assistance from BellSouth.

KPMG has been unable to replicate report values for the following SQMs for the month of October 1999³:

1. ***Coordinated Customer Conversions in the Provisioning category for the CLEC Aggregate.*** KPMG was unable to replicate the following values in the BellSouth SQM report:

Category	KPMG Calculations	BellSouth's Report
Without Number Portability; Count <=5	1888	1880
Without Number Portability;	81.48 %	81.14 %

¹ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) Web site.

² The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the *PMAP Raw Data User Manual* and the corresponding raw data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The *PMAP Raw Data User Manual* is posted and updated on the PMAP site.

³ BellSouth provided KPMG with the raw data and technical instructions necessary to validate the calculations, since the raw data and technical instruction was not available via the PMAP site.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 52

% <=5		
Without Number Portability; Count >15	114	122
Without Number Portability; % >15	4.92 %	5.27 %
Without Number Portability; Total Minutes	9369	9969
Without Number Portability; Average Interval (Min)	4.0	4.3

2. **Timeliness in the E911 category for the combined CLEC Aggregate and BellSouth Retail.** KPMG was unable to replicate the following values in the BellSouth SQM report:

Category	KPMG Calculations	BellSouth's Report
Percent answered 0-4 hours	82.94%	82.45%
Percent answered 4-8 hours	1.41%	3.08%
Percent answered 8-12 hours	2.53%	4.10%
Percent answered 12-16 hours	3.13%	1.27%
Percent answered 16-20 hours	2.44%	4.28%
Percent answered 20-24 hours	2.87%	1.33%
Percent answered 24+ hours	4.69%	3.50%

3. **Mean Interval in the E911 category for the combined CLEC Aggregate and BellSouth Retail.** KPMG was unable to replicate the Mean Interval Duration in the BellSouth SQM report:

Category	KPMG Calculations	BellSouth's Report
Mean Interval Duration	0.03	3.81

4. **Percent Rejected Service Requests in the Ordering category for the CLEC Aggregate.** KPMG was unable to replicate the BellSouth-reported SQM values for the Non-Mechanized report, using BellSouth's instructions.

Category	KPMG Calculations	BellSouth's Report
Product = Special; Product Specific % Rejected	0.331	0.329
Product = Special; Product Specific % Rejected	0.144	0.142

5. **Reject Interval in the Ordering category for the CLEC Aggregate.**
For several reports (*Partially Mechanized, Total Mechanized, and Non-Mechanized*), KPMG was unable to replicate the BellSouth reported SQM values, using BellSouth's instructions.

6. **FOC Timeliness in the Ordering category for the CLEC Aggregate.**

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 52

For each report (*Fully Mechanized, Partially Mechanized, Total Mechanized, and Non-Mechanized*), KPMG was unable to replicate the BellSouth reported SQM values, using BellSouth's instructions.

7. **Mean Held Order Interval and Distributions Interval in the Provisioning non-trunks category for the CLEC Aggregate and BellSouth Retail, and the Provisioning trunks category for the CLEC Aggregate.** KPMG was unable to replicate the BellSouth reported SQM values, using BellSouth's instructions.
8. **Usage Data Delivery Completeness in the Billing category for the CLEC Aggregate and BellSouth Retail.** KPMG was unable to replicate the BellSouth reported "Day >30 Cumulative % Completeness Benchmark" value. BellSouth reports a rounded value of 1, although there are usage data records delivered after 30 days.

Category	KPMG Calculations	BellSouth's Report
Day >30 Cumulative % Completeness Benchmark (CLEC Aggregate)	0.9974825	1
Day >30 Cumulative % Completeness Benchmark (BellSouth Retail)	0.9978706	1

9. **Mean Time to Deliver Usage in the Billing category for the CLEC Aggregate and BellSouth Retail.** BellSouth weighted the record volume by adding 1.5 to the "Days Delayed," rather than the 0.5 indicated in their written instructions. Thus, the BellSouth calculated value is greater than the KPMG-calculated value by 1.

Category	KPMG Calculations	BellSouth's Report
Mean Time (CLEC Aggregate)	3.64	4.64
Mean Time (BellSouth Retail)	2.42	3.42

10. **Usage Data Delivery Accuracy in the Billing category for the CLEC Aggregate.** KPMG was unable to replicate the BellSouth reported 'Total Data Packs Sent' value.

Category	KPMG Calculations	BellSouth's Report
Total Data Packs Sent	5012	5024

11. **Invoice Accuracy in the Billing category for the CLEC Aggregate.** KPMG was unable to replicate any of the BellSouth reported SQM values.
12. **Mean Time to Deliver Invoices in the Billing category for the CLEC Aggregate.**

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 52

KPMG was unable to replicate the BellSouth reported "Mean Time to Deliver CABS Bills" value for the Interconnection type of service.

Category	KPMG Calculations	BellSouth's Report
Mean Time to Deliver CABS Bills -cal day; Interconnection	5.74	5.66

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. KPMG's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the twelve applicable SQMs may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

BellSouth Response

Coordinated Customer Conversions in the Provisioning category for the CLEC Aggregate.

The reason for the difference between the BellSouth report values and the KPMG report values are because of different calculation methods.

BellSouth calculation for the "avg." cut minutes per item is derived using the following:
$$\text{avg. (cut time per item)} = (\text{cut comp} - \text{cut start}) / \# \text{ items}$$

KPMG derived this by using the following:
$$\text{avg. (cut time per item)} = \text{cut min} / \# \text{ items}$$

The file that was used for generating the PMAP report for October 1999 contained manually calculated cut minutes. There were some errors in these calculations but they were of no consequence because the cut minutes were not used by the formula to calculate the CCC report. (There is a BellSouth group that uses cut minutes data for other reports.) These miscalculations in the cut minutes were discovered and beginning in November 1999 the cut minutes were calculated mechanically. The formula for calculating the cut minutes was applied to the October file which was inadvertently sent to KPMG instead of the original raw data file that was sent to the PMAP databases for calculating the CCC report. Also, when the cut complete and cut start times are the same the cut minutes are defaulted to 1 (one) minute when preparing the raw data file. When the PMAP databases calculate the cut minutes, the actual value is used in these cases instead of a default value. Both files used by KPMG and the original raw data file for October is available for re-testing as required.

Timeliness in the E911 category for the combined CLEC Aggregate and BellSouth Retail.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 52

The values found in the October SQM are correct. The instructions provided to KPMG lacked the specificity to permit KPMG to replicate the data. BellSouth has revised the instructions to be more specific and corrected one calculation. As a result, KPMG was able to replicate the Timeliness values in the E911 category for the October 1999.

Mean Interval in the E911 category for the combined CLEC Aggregate and BellSouth Retail.

KPMG should follow the revised method included in Item No. 3 of BellSouth's instructions. By doing so, KPMG should be able to replicate the Mean Interval Duration found in BellSouth's October 1999 report.

Updated instructions were sent to KPMG for review in calculation of data. As of 5/02/00 KPMG advised BellSouth that they were unable to replicate the October 1999 E911 Mean Interval of 3.81. KPMG's derived number was 3.819. BellSouth's Application Developer revised the narrative of PMAP's E911 Duration Calculation Procedure and sent this to KPMG on 5/9/00. KPMG reported on 5/10/00 that they were able to replicate the BellSouth reported value for Mean Interval Duration for this SQM.

BellSouth has updated its instructions available to CLECs to reflect the information provided to KPMG. BellSouth does not provide Raw Data to the CLECs for *Mean Interval in the E911* categories and does not provide instructions to the CLECs.

Percent Rejected Service Requests in the Ordering category for the CLEC Aggregate.

BellSouth agrees with KPMG that they were unable to replicate the BellSouth reported SQM values for *Percent Rejected Service Request* for the Non-Mechanized report for the CLEC Aggregate for October 1999.

BellSouth discovered that there were reject count errors in the October raw data. PMAP coding changes implemented in November affecting LSRs received will not allow BellSouth to replicate the exclusions for October data. The February version of the Raw Data Users Manual will allow KPMG to replicate data from December 1999 through March 2000.

The following changes are important if KPMG desires to review additional months for data validation for this metric. A PMAP coding change request (Issue Tracker # 5705) implemented in April 2000 modified the SQM report to exclude LSRs cancelled prior to being rejected. The Raw Data Users Manual is being updated to reflect this information. A PMAP coding change request (Issue Tracker # 5542) has been issued to modify PMAP reports to reflect the new LCSC hours of operation. This coding change is scheduled to be implemented for May data in June 2000. Again, the Raw Data Users Manual will be updated to reflect this information.

Reject Interval in the Ordering category for the CLEC Aggregate.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 52

The values found in the October 1999 SQM are correct. Using the February version of the Raw Data Users Manual, KPMG was able to replicate the reported SQM values. BellSouth provided KPMG with sample queries and as a result, KPMG was able to replicate the *Reject Interval* for the CLEC Aggregate data for October 1999.

FOC Timeliness in the Ordering category for the CLEC Aggregate.

BellSouth agrees that KPMG was unable to replicate the BellSouth reported SQM for *FOC Timeliness* for the CLEC Aggregate for October 1999. Upon further investigation, BellSouth identified a problem in the interval "buckets". The difference between KPMG's numbers and PMAP's numbers can be attributed to the LSRs FOC'd (orders confirmed) in the 15th minute. KPMG was putting those LSRs in the 15-30 minute "bucket" while PMAP was including them in the 0-15 minute "bucket".

As a result of this KPMG draft exception, System Change Request 5848 was opened to clarify the bucket definitions and is scheduled to be effective for May data that will be published in June. The Raw Data Users Manual was updated in May, reflecting these changes.

The *FOC Timeliness* for the May report had to be rerun because prior to May, two pieces of code were designed to exclude non-mechanized LSRs, which were received and/or processed on weekends. Although the first piece of code was correctly rewritten to exclude appropriate weekend hours, the second was overlooked and LSRs received and/or processed on weekends continued to be excluded. The code was corrected and the report was rerun on July 27. Notification that May Ordering Reports had been rerun was posted to the Web on August 1, 2000. The July SQM further clarified the issue regarding the appropriate bucket for 15 minute FOCs.

BellSouth has provided KPMG with *FOC Timeliness* data for May and June 2000 for retesting.

Mean Held Order Interval and Distributions Interval in the Provisioning non-trunks category for the CLEC Aggregate and BellSouth Retail, and the Provisioning trunks category for the CLEC Aggregate.

Under investigation

Usage Data Delivery Completeness in the Billing category for the CLEC Aggregate and BellSouth Retail.

The PMAP reports for BellSouth 'Day >30 Cumulative % Completeness Benchmark (CLEC Aggregate) & Day >30 Cumulative % Completeness Benchmark (BellSouth Retail)' show the same results for OCT 1999 as KPMG. There was a programming problem that was corrected in PMAP, Issue Tracker #5584 on Feb 18, 2000. This report

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 52

has been re-run, verified to match, and resent to KPMG on 6/5/00. The file used by KPMG is available for retesting as required.

Mean Time to Deliver Usage in the Billing category for the CLEC Aggregate and BellSouth Retail.

There was a programming problem in PMAP that has been corrected.

The BellSouth team has researched these issues and they are now corrected as of 2/2/00. The weighting that is currently applied to this measure in an Excel spreadsheet is used by an Ardent job as a lookup table. The Excel table has been changed to provide the correct lookup for each interval by adding .5 rather than 1.5 to each interval. This was change request 5419. This report has been re-run, verified to match, and resent to KPMG on 6/5/00.

Usage Data Delivery Accuracy in the Billing category for the CLEC Aggregate.

The OCN/ACNA files used by PMAP for mapping the CLEC is a manual process. There were OCNs provided in the Billing data that were not included in the OCN/ACNA mapping file for PMAP. The data associated with these OCNs represent the difference in the KPMG & BellSouth reports. The PMAP group must manually update the OCN/ACNA tables to coincide with the CLECs OCN/ACNA value reflected on the individual accounts. A process for automating this function has been addressed by the PMAP group.

BellSouth has provided KPMG with an electronic copy of the NODS_RQ Company file for October 1999 on 6/22/00. KPMG was able to replicate the BellSouth 'Total Data Packs Sent' value for October 1999.

Invoice Accuracy in the Billing category for the CLEC Aggregate.

For Invoice Accuracy in the Billing Category for the CLEC Aggregate KPMG compared their calculations to the PMAP results. BellSouth used KPMG's comparisons to evaluate why the replication cannot be done on this measure. BellSouth evaluation of the data reveals that there are some OCNs and ACNAs on the BBI data that KPMG didn't include. Those OCNs / ACNAs that are not in KPMG's data are also the same ones that are not on the CLECID file in their comparison. If those OCNs / ACNAs were added into KPMG's data, the KPMG and Billing data figures would be the same. After review of the PMAP revenue amounts (and excluding the revenue amounts without OCN / ACNAs values in PMAP), the difference is that PMAP used the absolute value of the total billed revenue for UNE and Interconnection.

On 6/22/00 KPMG requested a copy of the rerun results for October 99 data for Invoice Accuracy. BellSouth provided KPMG with an electronic copy of the NODS_RQ Company file for October 1999 on 6/22/00.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 52

The differences in the data that Billing reported versus the figures that PMAP reported were due to the PMAP handling of the negative revenues and the fact that the October 1999 NODS_RQ Company file did not include some of the test accounts or ICOs. If KPMG excludes the fall out of the test accounts and ICOs from the totals, the results would be the same as reported in PMAP. In summary, if 'fallout' from PMAP is determined to be 'BST test data' or BST accounts that have not been identified as a valid CLEC, PMAP will exclude it from the final reports.

Mean Time to Deliver Invoices in the Billing category for the CLEC Aggregate.

The OCN/ACNA files used by PMAP for mapping the CLEC is a manual process. There were ACNAs provided in the Billing data that were not included in the OCN/ACNA mapping file for PMAP. The data associated with these ACNAs represent the difference in the KPMG & BellSouth PMAP reports. The PMAP group must manually update the OCN/ACNA tables to coincide with the CLECs OCN/ACNA value reflected on the individual accounts. A process for automating this function has been addressed by the PMAP group.

The *Mean Time to Deliver Invoices in the Billing category for the CLEC Aggregate* report was rerun for October 1999 after the 2 ACNAs/OCNs into the NODS_RQ Company file for October 1999. The report was provided to KPMG on 6/22/00. KPMG verified that the *Mean Time to Deliver CABS Bills* value for the Interconnection type of service matched the BellSouth reported value.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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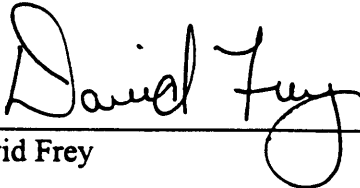
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RECEIVED

August 16th, 2000

AUG 16 2000

EXECUTIVE SECRETARY
G.P.S.C.

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue SW, Room 520
Atlanta, GA 30334

**RE: Investigation into Development of Electronic Interfaces for BellSouth's
Operational Support Systems; Docket No. 8354-U**

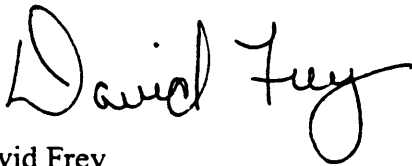
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG Consulting LLC's Exceptions 101 – 105 along with BellSouth's Responses to Exceptions 102 and 105 and Statements of Investigation for Exceptions 101, 103 and 104 for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,



David Frey
Manager

Enclosures

cc: Parties of Record





EXCEPTION 101

BellSouth Georgia OSS Testing Evaluation

Date: July 7, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measurement testing associated with the validation of service quality measurement (SQM) calculations.

Exception:

BellSouth-reported raw data values in usage data delivered to the KPMG Test CLEC, used in the calculation of three SQMs do not match the KPMG-collected values for April 2000.

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.¹

As part of the BellSouth-Georgia OSS Evaluation, KPMG is comparing the data that BellSouth uses to produce SQM reports for the KPMG Test CLEC with the corresponding data that KPMG collects using its own test management tools.

For three usage metrics: 1) *Usage Data Delivery Completeness*, 2) *Usage Data Delivery Timeliness*, and 3) *Mean Time to Deliver usage*, KPMG compared BellSouth raw data used to calculate the SQM values for each month from November 1999 to April 2000 with the data KPMG maintains as part of functional testing.

KPMG could not match the BellSouth-reported raw data values regarding the number of recorded usage records delivered (REC_VOL) to the KPMG Test CLEC with the data collected by KPMG for April 2000.

The following table lists the discrepancies found between the BellSouth-reported data and KPMG-collected data.

DAYS_DELAYED²	BLS-REPORTED VALUES OF REC VOL	KPMG-CALCULATED VALUES OF REC VOL
1	159	158
2	1229	1802
3	449	610

¹ These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.

² DAYS_DELAYED is the number of days to deliver the usage records.



EXCEPTION 101
BellSouth Georgia OSS Testing Evaluation

DAYS_DELAYED²	BLS-REPORTED VALUES OF REC VOL	KPMG-CALCULATED VALUES OF REC VOL
4	466	699
5	393	407
6	272	456
7	181	236
8	7	7
16	0	2
17	11	28
18	0	1
19	0	7
20	0	10
21	8	27
23	0	6
25	0	4
27	0	2
30+	11	5
Total Count	3,186	4,467

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. If SQM reports are based on incomplete or incorrect raw data, CLECs will not receive accurate SQM information for these purposes.



EXCEPTION 102

BellSouth Georgia OSS Testing Evaluation

Date: July 18, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Resale Functional Evaluation (PO&P11).

Exception:

BellSouth is unable to mechanically process telephone number changes for lines with measured classes of service 1MBGE.

KPMG submitted the following orders:

PON	DATE	Company Code
R011H21PTN100003*AE	5/2/00 4:28 PM	9990
R011H21PEN100006*AD	5/9/00 5:27 PM	9991

KPMG received the error message "USOC =: 1MBGE IS MISSING" on both responses.

KPMG forwarded this issue to BellSouth's Help Desk. BellSouth responded that it is unable to change the telephone number (TN) in these instances due to BellSouth system defect 9818.

Impact

The inability to change the TN on accounts with a Line Level Class of Service of "1MBGE" impacts CLECs in the following way:

- **Decrease in Customer Satisfaction.** This inability prevents a CLEC from mechanically changing its customer's telephone number based on a 'Measured Line Level Class of Service'. If a CLEC is unable to honor an end user's service request, CLEC customer satisfaction will decrease.



EXCEPTION 103
BellSouth Georgia OSS Testing Evaluation

Date: July 27, 2000

EXCEPTION REPORT

The following exception has been identified as a result of the CRIS Resale Invoicing Functional Evaluation (BLG-7).

Exception:

The KPMG Consulting Test CLEC received invoices from BellSouth containing inaccurate information.

As part of the CRIS Resale Invoicing Functional Evaluation, KPMG Consulting compared DUF records for each telephone number (where test usage was generated) and the corresponding bills received from BellSouth for these numbers.

KPMG Consulting found that, in some cases, usage records were not billed when usage was generated. Additionally, some usage charges appeared on Test CLEC bills when usage was not generated.

The following are representative occurrences of missing or additional usage charges from KPMG Consulting Test CLEC bills.

<u>Telephone Number</u>	<u>Account Number</u>	<u>Date Of Call</u>	<u>Bill Date</u>	<u>Missing Usage Records</u>	<u>Incorrect Usage Records</u>
404-633-0247	770-Q59-4492-492	4/5/00	4/29/00	3	0
404-633-0247	770-Q59-4492-492	4/6/00	4/29/00	1	0
706-235-6343	706-Q59-4492-492	4/5/00	4/29/00	0	3

The call details corresponding to the table above are as follows.

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local automated operator serviced 3 rd party
Date of Call	4/5/00
To Place	Atlanta
To Number	404-799-9478
From Number	404-633-4121
KPMG Consulting Expected Results	\$1.91
BellSouth Bill	Not located on bill



EXCEPTION 103
BellSouth Georgia OSS Testing Evaluation

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local operator completed collect
Date of Call	4/5/00
To Place	Atlanta
To Number	404-633-0247
From Number	404-633-4121
KPMG Consulting Expected Results	\$2.82
BellSouth Bill	Not located on bill
Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local operator completed collect
Date of Call	4/5/00
To Place	Atlanta
To Number	404-633-0247
From Number	404-633-4121
KPMG Consulting Expected Results	\$2.82
BellSouth Bill	Not located on bill
Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Toll record with corresponding credit record
Date of Call	4/6/00
To Place	Clayton
To Number	706-782-6488
From Number	404-633-0247
KPMG Consulting Expected Results	\$0.19
BellSouth Bill	Not located on bill
Telephone Number	706-235-6343
Account Number	770-Q59-4492-492
Call Type	Toll
Date of Call	4/5/00
To Place	Rome
To Number	706-235-6343
From Number	706-235-5762
KPMG Consulting Expected Results	No usage charges expected
BellSouth Bill	\$2.73



EXCEPTION 103

BellSouth Georgia OSS Testing Evaluation

Telephone Number	706-235-6343
Account Number	770-Q59-4492-492
Call Type	Band 4, 2 Expanded Local Area calls
KPMG Consulting Expected Results	No usage charges expected
BellSouth Bill	\$0.26

Telephone Number	706-235-6343
Account Number	770-Q59-4492-492
Call Type	Local Call
KPMG Consulting Expected Results	7 Local calls
BellSouth Bill	8 Local calls

Impact

Issuing invoices containing inaccurate usage information will impact CLECs in the following ways:

- **Decrease in Revenue.** Missing usage charges on CLEC invoices may lead to underbilling of end users, which will result in reduced revenue for CLECs.
- **Decreased Customer Satisfaction.** Incorrect charges for usage that was not generated may result in CLECs inappropriately billing end users. Inappropriately billing end users will result in a decrease in CLEC customer satisfaction.
- **Increase in operating costs.** Regardless of the net monetary effect of incorrect charges upon CLEC bills, a CLEC may be forced to regularly reconcile these bills – identifying and correcting the incorrect charges and rectifying the inconvenience caused to its customers. The necessity of an extensive validation of each bill and facility will increase CLEC resource utilization, thereby increasing operating costs.



EXCEPTION 104

BellSouth Georgia OSS Testing Evaluation

Date: July 25, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measurement testing associated with the validation of service quality measurement (SQM) calculations.

Exception:

BellSouth-reported raw data values for the KPMG Test CLEC do not match the KPMG-collected values for certain billing accounts involved in the calculation of *Mean Time To Deliver Invoices*, for both CRIS and CABS.

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.¹

As part of the BellSouth-Georgia OSS Evaluation, KPMG is comparing the data that BellSouth uses to produce SQM reports for the KPMG Test CLEC with the corresponding data that KPMG collects using its own test management tools. For *Mean Time to Deliver Invoices*, KPMG compared the raw data BellSouth used to calculate the SQM values for each month from November 1999 – May 2000 with the data KPMG maintains as part of functional testing. In the raw data for each month, BellSouth provides a list of the billing account numbers for which bills were sent.

KPMG could not match the BellSouth-reported values of the “number of business days” for certain CRIS accounts and the “number of calendar days” for certain CABS accounts with the KPMG-calculated values (which were calculated using BellSouth provided instructions). The two tables below (Table 1, and Table 2) show the specific discrepancies for CRIS and CABS bills, respectively.

Additionally KPMG found that certain KPMG Test CLEC CABS account numbers are not listed in the BellSouth raw data files used in the calculation of the metrics – *Mean Time to Deliver Invoices* – for the months February, March, April, and May.

Please see Table 3 below for a list of the missing account numbers.

¹ These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.



EXCEPTION 104
BellSouth Georgia OSS Testing Evaluation

TABLE 1: CRIS Accounts

BILLING ACCOUNT	BILL MONTH	BELLSOUTH-REPORTED VALUE	KPMG-CALCULATED VALUE
706Q591769	January	3	5
706Q594492	January	3	5
706Q594610	January	3	5
706Q594897	January	3	5
706Q596362	January	3	5
706Q599537	January	3	5

TABLE 2: CABS Accounts

BILLING ACCOUNT	BILL MONTH	BELLSOUTH-REPORTED VALUE	KPMG-CALCULATED VALUE
404N070032	May	5	3

TABLE 3: Missing CABS Accounts in BellSouth Raw Data Files

BILLING ACCOUNT	BILL MONTH
404N280022	February
706N010017	February
706N250034	February
706N250047	February
404N190120	March
706N160066	March, April, May

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. If SQM reports are based on incomplete or incorrect raw data, CLECs will not receive accurate SQM information for these purposes.



EXCEPTION 105

BellSouth Georgia OSS Testing Evaluation

Date: July 27, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Metrics Definition Documentation and Implementation Verification and Validation Review (PMR-2).

Exception:

Computation instructions provided by BellSouth for *Provisioning – Mean Held Order Interval and Distribution Intervals* are inconsistent with the information provided in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*¹.

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports².

As part of the BellSouth-Georgia OSS Evaluation, KPMG is comparing the instructions provided by BellSouth³ for computing SQMs to their definitions as documented in the *SQM Reports*⁴ in order to assess their consistency.

Computation instructions for *Provisioning – Mean Held Order Interval and Distribution Intervals* prescribe excluding records for which held order duration is greater than 120 days.⁵ This exclusion is not listed in the *SQM Reports*.

Impact

Inaccuracies and inconsistencies in SQM information and computation instructions may call into question the validity of the BellSouth's reported SQM values. CLECs rely on BellSouth's performance measurements to assess the quality of service provided by

¹ Relevant PMAP SQM information is documented in the Definitions, Exclusions, Calculation and Business Rules sections of the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*.

² These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform ("PMAP") Web site.

³ KPMG used instructions from the *PMAP Raw Data User Manual – Version 2.0.4 – December 15, 1999* and information provided by BellSouth personnel.

⁴ KPMG used the 10/22/99 version of the *SQM Reports* as a basis to perform this test. KPMG also took into consideration changes published in the 2/24/00 version of the *SQM Reports*.

⁵ Step 8 of the computation instructions for *Mean Held Order Interval and Distribution Intervals* as published in the 12/15/99 *PMAP Raw Data User Manual* (p.25).



EXCEPTION 105

BellSouth Georgia OSS Testing Evaluation

BellSouth and to plan future business activities. If BellSouth's reported SQM values are not correct, CLECs might not be able to conduct these functions reliably.

BELLSOUTH'S RESPONSE TO EXCEPTION 102



July 31, 2000

EXCEPTION REPORT

An exception has been identified as a result of the EDI and TAG Resale Functional Evaluation (PO&P11).

Exception:

BellSouth is unable to mechanically process telephone number changes for lines with measured classes of service 1MBGE.

KPMG submitted the following orders:

PON	DATE	Company Code
R011H21PTN100003*AE	5/2/00 4:28 PM	9990
R011H21PEN100006*AD	5/9/00 5:27 PM	9991

KPMG received the error message "USOC =: 1MBGE IS MISSING" on both responses.

KPMG forwarded this issue to BellSouth's Help Desk. BellSouth responded that it is unable to change the telephone number (TN) in these instances due to BellSouth system defect 9818.

Impact

The inability to change the TN on accounts with a Line Level Class of Service of "1MBGE" impacts CLECs in the following way:

- **Decrease in Customer Satisfaction.** This inability prevents a CLEC from mechanically changing its customer's telephone number based on a 'Measured Line Level Class of Service'. If a CLEC is unable to honor an end user's service request, CLEC customer satisfaction will decrease.

BellSouth Response

KPMG is correct in their assessment; BellSouth is unable to mechanically process telephone number changes for lines with measured classes of service 1MBGE. BellSouth system functionality was corrected (D9818) July 29, 2000 release.

BELLSOUTH'S RESPONSE TO EXCEPTION 105



August 10, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Metrics Definition Documentation and Implementation Verification and Validation Review (PMR-2).

Exception:

Computation instructions provided by BellSouth for *Provisioning – Mean Held Order Interval and Distribution Intervals* are inconsistent with the information provided in the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*¹.

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports².

As part of the BellSouth-Georgia OSS Evaluation, KPMG is comparing the instructions provided by BellSouth³ for computing SQMs to their definitions as documented in the *SQM Reports*⁴ in order to assess their consistency.

Computation instructions for *Provisioning – Mean Held Order Interval and Distribution Intervals* prescribe excluding records for which held order duration is greater than 120 days.⁵ This exclusion is not listed in the *SQM Reports*.

Impact

Inaccuracies and inconsistencies in SQM information and computation instructions may call into question the validity of the BellSouth's reported SQM values. CLECs rely on

¹ Relevant PMAP SQM information is documented in the Definitions, Exclusions, Calculation and Business Rules sections of the *Service Quality Measurements Georgia Performance Reports (SQM Reports)*.

² These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform ("PMAP") Web site.

³ KPMG used instructions from the *PMAP Raw Data User Manual – Version 2.0.4 – December 15, 1999* and information provided by BellSouth personnel.

⁴ KPMG used the 10/22/99 version of the *SQM Reports* as a basis to perform this test. KPMG also took into consideration changes published in the 2/24/00 version of the *SQM Reports*.

⁵ Step 8 of the computation instructions for *Mean Held Order Interval and Distribution Intervals* as published in the 12/15/99 *PMAP Raw Data User Manual* (p.25).

BELLSOUTH'S RESPONSE TO EXCEPTION 105

BellSouth's performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. If BellSouth's reported SQM values are not correct, CLECs might not be able to conduct these functions reliably.

BellSouth Response

Rather than adding the exclusion to the SQM, BellSouth will delete the exclusion from the code. Initially the exclusion was used because cancelled orders were not being processed correctly in Held Order. Orders that were actually cancelled continued to appear as Held. Also, duplicate order numbers were being assigned the issue date of one order and the held status of the later order.

Cancelled orders have been processed in PMAP since 1999 and with the implementation of recent change requests that exclude orders with issue dates later than completion dates, BellSouth can now eliminate the code that excludes orders over 120 days, thus eliminating duplicate order numbers where one may be held but the issue date captured is of a previous order. Change requests 5909 and 5911 were implemented 7/15/00 to properly process Held orders. Additionally, change request 6034 was submitted to remove 120-day exclusion from Held Order code and will be implemented with the July reports published August 15, 2000. The Raw data User Manual will be updated to remove exclusion in the August 15th version.

BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 101



July 18, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measurement testing associated with the validation of service quality measurement (SQM) calculations.

Exception:

BellSouth-reported raw data values in usage data delivered to the KPMG Test CLEC, used in the calculation of three SQMs do not match the KPMG-collected values for April 2000.

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.¹

As part of the BellSouth-Georgia OSS Evaluation, KPMG is comparing the data that BellSouth uses to produce SQM reports for the KPMG Test CLEC with the corresponding data that KPMG collects using its own test management tools.

For three usage metrics: 1) *Usage Data Delivery Completeness*, 2) *Usage Data Delivery Timeliness*, and 3) *Mean Time to Deliver usage*, KPMG compared BellSouth raw data used to calculate the SQM values for each month from November 1999 to April 2000 with the data KPMG maintains as part of functional testing.

KPMG could not match the BellSouth-reported raw data values regarding the number of recorded usage records delivered (REC_VOL) to the KPMG Test CLEC with the data collected by KPMG for April 2000.

The following table lists the discrepancies found between the BellSouth-reported data and KPMG-collected data.

<i>DAYS_DELAYED²</i>	<i>BLS-REPORTED VALUES OF REC VOL</i>	<i>KPMG-CALCULATED VALUES OF REC VOL</i>
1	159	158

¹ These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.

² DAYS_DELAYED is the number of days to deliver the usage records.

BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 101

<i>DAYS DELAYED</i>	<i>BLS-REPORTED VALUES OF REC VOL</i>	<i>KPMG-CALCULATED VALUES OF REC VOL</i>
2	1229	1802
3	449	610
4	466	699
5	393	407
6	272	456
7	181	236
8	7	7
16	0	2
17	11	28
18	0	1
19	0	7
20	0	10
21	8	27
23	0	6
25	0	4
27	0	2
30+	11	5
<i>Total Count</i>	3,186	4,467

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. If SQM reports are based on incomplete or incorrect raw data, CLECs will not receive accurate SQM information for these purposes.

BellSouth Response

BellSouth is currently investigating this exception and will provide a response when investigation is complete.

BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 103



August 10, 2000

EXCEPTION REPORT

The following exception has been identified as a result of the CRIS Resale Invoicing Functional Evaluation (BLG-7).

Exception:

The KPMG Consulting Test CLEC received invoices from BellSouth containing inaccurate information.

As part of the CRIS Resale Invoicing Functional Evaluation, KPMG Consulting compared DUF records for each telephone number (where test usage was generated) and the corresponding bills received from BellSouth for these numbers.

KPMG Consulting found that, in some cases, usage records were not billed when usage was generated. Additionally, some usage charges appeared on Test CLEC bills when usage was not generated.

The following are representative occurrences of missing or additional usage charges from KPMG Consulting Test CLEC bills.

<u>Telephone Number</u>	<u>Account Number</u>	<u>Date Of Call</u>	<u>Bill Date</u>	<u>Missing Usage Records</u>	<u>Incorrect Usage Records</u>
404-633-0247	770-Q59-4492-492	4/5/00	4/29/00	3	0
404-633-0247	770-Q59-4492-492	4/6/00	4/29/00	1	0
706-235-6343	706-Q59-4492-492	4/5/00	4/29/00	0	3

The call details corresponding to the table above are as follows.

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local automated operator serviced 3 rd party
Date of Call	4/5/00
To Place	Atlanta
To Number	404-799-9478
From Number	404-633-4121
KPMG Consulting Expected Results	\$1.91
BellSouth Bill	Not located on bill

BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 103

Telephone Number 404-633-0247
Account Number 770-Q59-4492-492
Call Type Local operator completed collect
Date of Call 4/5/00
To Place Atlanta
To Number 404-633-0247
From Number 404-633-4121
KPMG Consulting Expected Results \$2.82
BellSouth Bill Not located on bill

Telephone Number 404-633-0247
Account Number 770-Q59-4492-492
Call Type Local operator completed collect
Date of Call 4/5/00
To Place Atlanta
To Number 404-633-0247
From Number 404-633-4121
KPMG Consulting Expected Results \$2.82
BellSouth Bill Not located on bill

Telephone Number 404-633-0247
Account Number 770-Q59-4492-492
Call Type Toll record with corresponding credit record
Date of Call 4/6/00
To Place Clayton
To Number 706-782-6488
From Number 404-633-0247
KPMG Consulting Expected Results \$0.19
BellSouth Bill Not located on bill

Telephone Number 706-235-6343
Account Number 770-Q59-4492-492
Call Type Toll
Date of Call 4/5/00
To Place Rome
To Number 706-235-6343
From Number 706-235-5762
KPMG Consulting Expected Results No usage charges expected
BellSouth Bill \$2.73

BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 103

Telephone Number	706-235-6343
Account Number	770-Q59-4492-492
Call Type	Band 4, 2 Expanded Local Area calls
KPMG Consulting Expected Results	No usage charges expected
BellSouth Bill	\$0.26

Telephone Number	706-235-6343
Account Number	770-Q59-4492-492
Call Type	Local Call
KPMG Consulting Expected Results	7 Local calls
BellSouth Bill	8 Local calls

Impact

Issuing invoices containing inaccurate usage information will impact CLECs in the following ways:

- **Decrease in Revenue.** Missing usage charges on CLEC invoices may lead to underbilling of end users, which will result in reduced revenue for CLECs.
- **Decreased Customer Satisfaction.** Incorrect charges for usage that was not generated may result in CLECs inappropriately billing end users. Inappropriately billing end users will result in a decrease in CLEC customer satisfaction.
- **Increase in operating costs.** Regardless of the net monetary effect of incorrect charges upon CLEC bills, a CLEC may be forced to regularly reconcile these bills – identifying and correcting the incorrect charges and rectifying the inconvenience caused to its customers. The necessity of an extensive validation of each bill and facility will increase CLEC resource utilization, thereby increasing operating costs.

BellSouth Response

BellSouth is currently investigating this exception and will provide a response when the investigation is complete.

BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 104



August 10, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measurement testing associated with the validation of service quality measurement (SQM) calculations.

Exception:

BellSouth-reported raw data values for the KPMG Test CLEC do not match the KPMG-collected values for certain billing accounts involved in the calculation of *Mean Time To Deliver Invoices*, for both CRIS and CABS.

SQMs are calculated to illustrate BellSouth's Operational Support System (OSS) performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.¹

As part of the BellSouth-Georgia OSS Evaluation, KPMG is comparing the data that BellSouth uses to produce SQM reports for the KPMG Test CLEC with the corresponding data that KPMG collects using its own test management tools. For *Mean Time to Deliver Invoices*, KPMG compared the raw data BellSouth used to calculate the SQM values for each month from November 1999 – May 2000 with the data KPMG maintains as part of functional testing. In the raw data for each month, BellSouth provides a list of the billing account numbers for which bills were sent.

KPMG could not match the BellSouth-reported values of the "number of business days" for certain CRIS accounts and the "number of calendar days" for certain CABS accounts with the KPMG-calculated values (which were calculated using BellSouth provided instructions). The two tables below (Table 1, and Table 2) show the specific discrepancies for CRIS and CABS bills, respectively.

Additionally KPMG found that certain KPMG Test CLEC CABS account numbers are not listed in the BellSouth raw data files used in the calculation of the metrics – *Mean Time to Deliver Invoices* – for the months February, March, April, and May.

Please see Table 3 below for a list of the missing account numbers.

¹ These reports and raw data may be delivered in hard copy or via the secured Performance Measurement and Analysis Platform (PMAP) web site.

BELLSOUTH'S STATEMENT OF INVESTIGATION FOR EXCEPTION 104

TABLE 1: CRIS Accounts

BILLING ACCOUNT	BILL MONTH	BELLSOUTH-REPORTED VALUE	KPMG-CALCULATED VALUE
706Q591769	January	3	5
706Q594492	January	3	5
706Q594610	January	3	5
706Q594897	January	3	5
706Q596362	January	3	5
706Q599537	January	3	5

TABLE 2: CABS Accounts

BILLING ACCOUNT	BILL MONTH	BELLSOUTH-REPORTED VALUE	KPMG-CALCULATED VALUE
404N070032	May	5	3

TABLE 3: Missing CABS Accounts in BellSouth Raw Data Files

BILLING ACCOUNT	BILL MONTH
404N280022	February
706N010017	February
706N250034	February
706N250047	February
404N190120	March
706N160066	March, April, May

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. If SQM reports are based on incomplete or incorrect raw data, CLECs will not receive accurate SQM information for these purposes.

BellSouth Response

BellSouth is currently investigating this exception and will provide a response when the investigation is complete.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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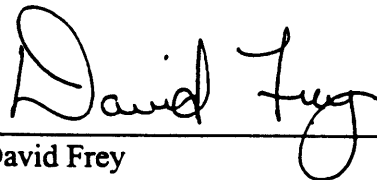
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This 16th day of August, 2000.



David Frey

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Philadelphia, PA 19103-7212

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RECEIVED

August 25th, 2000

AUG 25 2000

EXECUTIVE SECRETARY
G.P.S.C.

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue SW, Room 520
Atlanta, GA 30334

**RE: Investigation into Development of Electronic Interfaces for BellSouth's
Operational Support Systems; Docket No. 8354-U**

Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG Consulting LLC's Closure Reports for Exceptions 1, 41 and 82 for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,

David Frey
Manager

Enclosures

cc: Parties of Record



Date: August 25, 2000

EXCEPTION CLOSURE REPORT

Exception:

Bellsouth does not have comprehensive, usable business rule documentation for submitting electronic pre-order transactions via the TAG interface.

Summary of Exception:

Business rule documentation should provide a Competitive Local Exchange Carrier (CLEC) with clear and complete instructions on populating field or data element values necessary for each transaction type.

BellSouth Pre-Order Documentation

BellSouth currently refers CLECs to a variety of documents to obtain pre-order business rule information, including the following:

- *TAG API Reference Guide*
- *TAG Programmer's Job Aid*
- TAG training presentation materials

None of the documents listed above provides a comprehensive business rule guide for pre-order queries using the TAG interface. While certain business rule components are included in one or more of the TAG documents (e.g., *API Guide* provides data element arrangement), these references are incomplete and sometimes inconsistent across the documents. Information on data element definitions, data characteristics, number of occurrences and conditional usage requirements is absent from all TAG pre-order documentation. Information on data element usage, found only in the presentation materials obtained during TAG training, is incomplete. Usage rules for pre-order inquiries are only provided for a select number of fields. In addition to the absence of business rules for submitting pre-order inquiries, BellSouth TAG documentation does not provide adequate information on pre-order response files. This information is required for development of integrated pre-order/order processes where information returned from pre-order inquiries is programmatically input into order entry systems.

Some of the pre-order business rule information is only provided during TAG training classes and is not available on the BellSouth documentation Website. As a result, there are inadequate document management procedures surrounding the updating and distribution of these materials

Summary of BellSouth Response:

“A comprehensive document providing business rules for pre-order transactions is currently under development. It will contain a data dictionary providing definitions of all fields, usage rules, data characteristics, number of occurrences and valid entries, where applicable. This document will be available to all CLECs on the Interconnection website by the end of 1999.”

Summary of KPMG Consulting Re-test Activities:

KPMG Consulting’s re-test activities for this exception consisted of a documentation review of the Pre-order Business Rules found on BellSouth’s Interconnection Web site (www.interconnection.bellsouth.com) to ensure that comprehensive, usable business rules for submitting electronic pre-order transactions via the TAG interface are available.

KPMG Consulting Re-test Results:

As a result of several iterations of documentation review, KPMG Consulting found that BellSouth has developed and posted to its Web site adequate business rules for submitting electronic pre-order transactions via the TAG interface.

The pre-order business rules documentation contains the following components:

- Data element names and abbreviations
- Data element arrangement
- Data element definitions
- Data element usage
- Number of occurrences
- Data characteristics
- Specific rules for conditional usage requirements
- List of valid entries, where appropriate
- Examples of data inputs, where appropriate
- Applicable BellSouth interfaces

The BellSouth Pre-order Business Rules, version 7.0, dated July 17th, 2000 can be found on BellSouth’s Web site (See www.interconnection.bellsouth.com/guides/guides/html.)

Based on re-testing activities, KPMG Consulting, with the concurrence of the Georgia Public Service Commission, closes Exception 1.

Attachments: None.

CLOSURE REPORT FOR EXCEPTION 41

BellSouth Georgia OSS Testing Evaluation

Date: August 25, 2000

EXCEPTION CLOSURE REPORT

An exception has been identified as a result of the Flow Through Evaluation.

Exception:

BellSouth does not provide Competitive Local Exchange Carriers (CLECs) with adequate flow through information.

Summary of Exception:

Comprehending the flow through process is critical to CLECs for ensuring the timely and accurate provisioning of service requests¹. However, based on all information currently available from BellSouth, CLECs are unable to accurately understand and utilize flow through reporting. BellSouth does not provide adequate information to CLECs regarding flow through in the following areas:

- 1) Detailed documentation regarding expected flow through does not exist.
- 2) BellSouth's flow through reporting cannot be validated.

1) Detailed documentation regarding expected flow through does not exist. While BellSouth's *Service Quality Measures* document does provide a list of products that will flow through if the transaction does not contain errors, the document does not provide any detail regarding Requisition/Activity types for the transactions². Even though a product is listed as flow through, a service order requesting this product may not necessarily flow through due to the transactions Requisition/Activity type.

2) BellSouth's flow through reporting cannot be validated. While BellSouth provides raw data in support of other quality metrics, it does not provide this data to support flow through reporting. The only documentation provided on the Performance Metrics (PMAP) Web site, *BellSouth Service Quality Measurements – Regional Performance Reports (SQM)*, is inadequate for CLECs to attempt to validate any ordering information received with BellSouth's flow through reports. Examples of data necessary to validate order flow through information include identification of orders which:

¹ Flow through is defined as "the ability for a Local Service Request (LSR) to pass electronically from a CLEC into BellSouth's SOCS system and generate an FOC without manual intervention."- *BellSouth - Georgia OSS Evaluation Master Test Plan version 3.0, Appendix D-2*.

² *BellSouth Service Quality Measurements – Regional Performance Reports (09/21/1999)*; Attachment BellSouth Flow through Analysis for CLECs LSRs placed via TAG or EDI, pages 10 - 12

CLOSURE REPORT FOR EXCEPTION 41

BellSouth Georgia OSS Testing Evaluation

- Are electronically submitted but fallout by design for manual processing;
- Flow through or fallout for manual processing due to errors;
- Did not flow through for CLEC caused issues but for which the CLEC did not receive a request for clarification;
- Did not flow through due to BellSouth caused issues.

Without a clear understanding of how the flow through reports are prepared and the necessary data, CLECs are unable to validate the flow through reports.

Summary of BellSouth's Responses:

"1) An additional matrix showing the LSR req types, activity types and any other parameters which can flow through was added to the LEO-IG on April 28, 2000.

2) Starting with the April 15, 2000 posting for March, 2000 data, BellSouth will provide each CLEC access to their individual raw data file via the CLEC PMAP web site. The raw data file will contain information relative to each LSR's CC, PON, and ver issued by that CLEC during the report period. The information will be in .txt file format and will contain CC, PON, & VER, the notes time stamp, the notes type, the note (description), with the error code included in the note field. LSRs included are: LSRs that flowed through, LSRs that were electronically submitted but fell out by BellSouth design for BellSouth manual processing; LSRs that fell out for manual processing due to service order errors; LSRs that did not flow through for CLEC caused issues; LSRs that did not flow through for CLEC caused issues for which the CLEC did not receive a request for clarification (for example, a small error which BST may occasionally correct for the CLEC to help attain their desired due date, which will then be counted by default as a BST error), and LSRs that did not flow through due to BellSouth caused issues. An explanation of the file including the fields contained within the files will be provided on the first page each CLEC's .txt file. CLECs will be notified at least one week in advance of posting of the raw data files that the files are available."

Summary of KPMG Consulting Re-test Activities:

KPMG Consulting's re-test activities were based on the two topics identified in the exception.

- 1) *Detailed documentation regarding expected flow through does not exist:* KPMG Consulting's re-testing activity consisted of reviewing the documentation identified by BellSouth in its responses to Exception 41.
- 2) *BellSouth's flow through reporting cannot be validated:* KPMG Consulting's re-

CLOSURE REPORT FOR EXCEPTION 41

BellSouth Georgia OSS Testing Evaluation

testing activities for this area consisted of:

- A) Validating the raw data published by BellSouth. KPMG Consulting used raw data published by BellSouth to determine the flow through status for each KPMG Consulting Test CLEC transaction submitted. The results were compared against two independently prepared lists: BellSouth determination of the flow through status for each LSR submitted by the KPMG Consulting Test CLEC; and KPMG Consulting's determination of the flow through status for each LSR submitted by the KPMG Consulting Test CLEC based on instructions and data previously acquired from BellSouth in the course of the test.
- B) Validating instructions for using the raw data to verify flow through status. KPMG Consulting reviewed the instructions published with the raw data against BellSouth's previous instructions for determining flow through status. KPMG Consulting, using personnel who had not previously been exposed to BellSouth Flow Through reporting or replication, determined the flow through status of KPMG Consulting Test CLEC LSRs using only instructions provided with the flow through raw data published by BellSouth and other public documents.
- C) Reviewing instructions for using the raw data with a CLEC. BellSouth changes to the instructions resulting from the CLEC's comments were reviewed by KPMG Consulting.

KPMG Consulting Re-test Results:

- 1) *Detailed documentation regarding expected flow through does not exist.* KPMG Consulting's review found that the documentation identified by BellSouth in its response to Exception 41 does provide adequate information on the expected flow through status of LSRs by products and Requisition/Activity types for different types of transactions.
- 2) *BellSouth's flow through reporting cannot be validated:* KPMG Consulting's determination of the flow through status of individual LSRs, based on instructions for using the raw data, produced results identical to the independent determinations made by BellSouth and KPMG Consulting.

KPMG Consulting believes this updated information is sufficiently descriptive to enable a CLEC to understand how to determine whether individual LSRs flowed through or fell out for any reason.

As a result, KPMG Consulting believes that BellSouth has adequately addressed the issues raised in Exception 41.

CLOSURE REPORT FOR EXCEPTION 41

BellSouth Georgia OSS Testing Evaluation

Based on re-testing activities, KPMG Consulting, with the concurrence of the Georgia Public Service Commission, closes Exception 41.

Attachments: None.

Date: August 25, 2000

EXCEPTION CLOSURE REPORT

Exception:

BellSouth Central Office (CO) technicians and Unbundled Network Element Center (UNEC) coordinators do not adhere to BellSouth's methods and procedures for provisioning coordinated hot-cuts.

Summary of Exception:

Background: A "coordinated hot-cut" is a synchronized process for converting an end-user's service from one service provider (in this case BellSouth) to another. In a coordinated hot-cut, provisioning activities between the service providers occur in a coordinated, sequential fashion. Service is terminated by the old service provider and then immediately re-provisioned by the new service provider. In this manner, the end-user experiences little or no noticeable delay in the provisioning of new service.

BellSouth Coordinated Hot-Cut Methods and Procedures: To facilitate consistency across COs, BellSouth utilizes a series of documents that comprise the company's methods and procedures for performing coordinated hot-cuts. According to these methods and procedures, BellSouth Main Distribution Frame (MDF) technicians at the various COs are required to perform certain tasks in a certain time and in a certain order. Likewise, BellSouth representatives in the UNEC perform certain scripted tasks. The end-user service is either smoothly transitioned to the new service provider, or the process is halted so that the end-user does not suffer a service outage.

BellSouth documentation states that the technician must perform the following tasks in order at the MDF:

1. Be familiar with Hot Cut Methods and Procedures
2. Pre-Wire the Frame
3. Check Dial Tone and ANAC¹ 1
4. Complete an Idle Check
5. Check ANAC 2
6. Check ANAC 3

¹ An ANAC circuit is a testing tool available to central office technicians that are built within the particular Central Office switch. A central office technician uses the ANAC circuit to verify that they are working on the correct tip/ring posts. (assignment). This circuit is wired into a loud speaker within the central office. The technician enters a special central office ANAC # (i.e. 222222) and the TN for the pair that the technician has selected is broadcasted over this loud speaker.

7. Record the Out-Of-Service Time

BellSouth documentation states that the representative must perform the following tasks in order at the UNEC (and in a coordinated fashion with the MDF technician):

1. Place a pre-cut call to the CLEC to ensure that the CLEC is prepared for the hot-cut.
2. Place a post-cut call to the CLEC to ensure that service was properly provisioned.

KPMG Consulting's (KCL) Observation of Coordinated Hot-Cuts: During the period of April 24, 2000 through April 27, 2000, KCL visited seven different BellSouth CO's and observed 9 coordinated hot-cuts involving 23 lines. KCL observed each of the eight job tasks performed by the BellSouth's MDF technicians and the two tasks performed by the UNEC.

Adherence by BellSouth's MDF technicians to the company's established methods and procedures for coordinated hot-cuts varied. The UNE Specific Work Instructions were not consistently followed (as prescribed in the methods and procedures documentation) in any of the MDFs. BellSouth's UNEC representatives did not place the pre-cut call (specified to occur just prior to the conversion) for any of the coordinated hot-cuts observed by KPMG.

Summary of BellSouth's Response:

"The Provisioning Verification Evaluation identified adequacy and interpretation issues for some of the methods and procedures (m&p) used by BellSouth in the provisioning of coordinated hot-cuts. The testing efforts were halted on 4/27/00 so BellSouth could address the m&p issues. BellSouth revised some specific internal Central Office and Unbundled Network Element Center m&ps used in the provisioning of hot-cuts. Copies of these internal documents were provided to KPMG and re-testing activities began the week of 5/8/00."

Summary of KCL Re-test Activities:

KCL began conducting re-test observations of CLEC hot-cuts during the week of May 8, 2000. KCL evaluated BellSouth's adherence to its methods and procedures according to the latest version of the *BellSouth Unbundled Network Element Methods and Procedures*.

**KCL Re-test Results:**

In the absence of Georgia Public Service Commission-approved measures and standards for adherence to documented methods and procedures for provisioning of coordinated hot cuts, KCL applied a standard of 85% adherence based on its professional judgment.

KCL observed 54 coordinated hot-cuts during the re-test period, which contained a total of 1157 tasks². KCL determined that BellSouth achieved a 97% rate of adherence³ to the methods and procedures for provisioning coordinated hot-cuts identified in the latest version of the *BellSouth Unbundled Network Element Methods and Procedures*⁴.

As a result of its re-test observations, KCL concludes that BellSouth adequately adheres to its documented methods and procedures for provisioning coordinated hot-cuts.

Based on re-testing activities, KCL, with the concurrence of the Georgia Public Service Commission, closes Exception 82.

Attachments: None.

² Note that in an attempt to ensure "representativeness" of the observed sample of hot cuts relative to the set of coordinated hot cut provisioning activity occurring across the state of Georgia, KPMG Consulting observers solicited "live" loop migration schedules from a number of CLECs that interact with BellSouth for coordinated activities. Over a multi-week period, two teams worked in parallel visiting BellSouth Central Offices Monday through Friday. Observations were sampled from these schedules and included trips to both metropolitan and suburban Central Offices. Because the teams were active all day, they viewed hot-cuts at a variety of times as well. This approach allowed for the test to maintain appropriate blindness. Since data is not collected on every hot cut occurring at BellSouth, there is no way to prove the representativeness of the sample. However, since the sample was blind, and had good coverage of the different types and times of hot cuts, KPMG Consulting believes that it was representative.

³ The 97% rate of adherence is based on the number of tasks performed properly relative to the 1157 tasks observed.

⁴ The *BellSouth Unbundled Network Element Methods and Procedures* is a BellSouth internal document.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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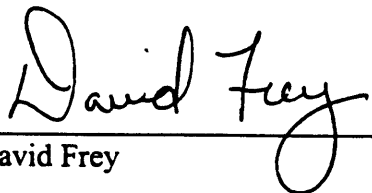
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This 25th day of August, 2000.

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RECEIVED

AUG 25 2000

**EXECUTIVE SECRETARY
G.P.S.C.**

August 25th, 2000

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue SW, Room 520
Atlanta, GA 30334

**RE: Investigation into Development of Electronic Interfaces for BellSouth's
Operational Support Systems; Docket No. 8354-U**

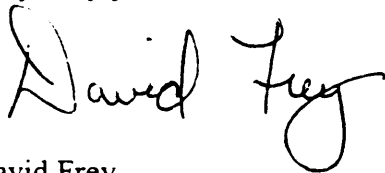
Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of BellSouth's responses to Exceptions 76 (2nd Amended), 80 (Amended) and 103, amended responses to Exceptions 35, 73 and 94, second amended responses to Exceptions 35, 91 and 100, fourth amended response to Exception 27, and fifth amended responses to Exceptions 16, 52, 89 and 92 for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,



David Frey
Manager

Enclosures



**BELLSOUTH'S RESPONSE TO EXCEPTION 76
(SECOND AMENDED)**



August 21, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Provisioning Verification Test (O&P-5).

Exception:

KPMG encountered numerous BellSouth provisioning errors for Unbundled Network Element (UNE) orders.

During provisioning verification testing, data from confirmed Local Service Requests (LSRs) was compared to: a) post-order Customer Service Records (CSRs); b) switch translation data; and c) the BellSouth directory listing database.

Of the 279 UNE orders, which were validated, 98 post-order CSRs (35%) contained different information than their corresponding LSRs. Of the 98 orders, 42 (43%) were flow through and 56 (57%) were non-flow through¹.

Of the 315 Switch Translations for UNE lines, which were validated, 27 lines (9%) contained different information than their corresponding LSRs. Of the 27 lines, 19(70%) were flow through and 10 (30%) were non-flow through.

Of the 138 Directory Listing for UNE orders, which were validated, 18 orders (13%) contained different information than their corresponding LSRs. Of the 18 orders, 6 (33%) were flow through and 12 (67%) were non-flow through.

Validation errors fell into the following categories: 1) Incorrect Features 2) Incorrect Address 3) Incorrect Provisioning 4) Other CSR Errors 5) Incorrect Directory Listings.

¹ KPMG's Flow Through Evaluation team, using an algorithm, determined whether an LSR actually flowed through BellSouth's systems or fell out for manual processing. BellSouth did not validate the algorithm used by KPMG to determine actual flow through.

BELLSOUTH'S RESPONSE TO EXCEPTION 76 (SECOND AMENDED)

The following table provides details regarding CSR, Switch Translation and Directory Listing provisioning errors:

CSR VERIFICATION							
Incorrect Features							
PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
402E223PTM000002	3	FV	7702268258	9994	Missing Feature (NSY)	No	Agree. Human error, not a trend.
424A314PTJ000001	2	MV	6785790524882	9994	Missing Feature Code from order on BTN (RJ11C)	No	Agree. Human error, not a trend.
625A214PEJ100004	1	MC	6783932936441	9994	Incorrect Features	Yes	Agree. System defect. Corrected problem on 5/20/00.
625A214PTJ100001	5	MC	7709538539932	9991	Missing Feature (HBY)	No	Agree. KPMG sent HBY in error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.
625A214PTJ100013	1	MC	7062920388	9991	Missing Feature (Hunting)	Yes	Agree. System defect. Corrected problem on 5/20/00.
626A224PEJ100006	0	MC	7708501852613	9991	Missing Feature (HBY)	Yes	Agree. KPMG sent HBY in error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.
626A224PEJ101003	2	MC	7067246590649	9991	Missing Feature (HBY)	Yes	Agree. KPMG sent HBY in error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.
626A224PEJ101011	0	MC	7062359179255	9991	Missing Feature (HBY)	Yes	Agree. KPMG sent HBY in error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.
626A224PTJ100002	4	MC	7067244960	9991	Missing Feature (HBY); Incorrect address	No	Agree. KPMG sent HBY in error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.

**BELLSOUTH'S RESPONSE TO EXCEPTION 76
(SECOND AMENDED)**

PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
626A224PTJ100013	0	MC	6785799353719	9991	Missing Feature (HBY)	Yes	Agree. KPMG sent HBY in error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.
626A224PTJ100014	1	MC	7062357249255	9991	Missing Feature (HBY)	Yes	Agree. KPMG sent HBY in error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.
626A224PTJ100017	0	MC	4046348771752	9991	Missing Feature (HBY)	Yes	Agree. KPMG sent HBY in error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.
627A214PTJ100007	1	MC	9127430461080	9991	Feature (HTG) not removed.	No	Agree. System defect. Corrected problem on 5/20/00.
627A214PTJ101002	0	MC	7067246133543	9991	Feature (HTG) not removed.	No	Agree. System defect. Corrected problem on 5/20/00.
409A223PTM100001	5	FC	7067225636	9991	Missing Feature (ESX)	Yes	Agree. ESX is not present on CSR. PON has been archived.
428A224PTJ100002	1	MV	4046342841417	9994	Missing 1 (one) TN and feature. Missing Directory Listing; Incorrect "Q" account listed.	No	Agree. Service rep error
625A214PEJ100005	0	MC	9127434571318	9991	Incorrect Features	Yes	Agree. System defect. Corrected problem on 5/20/00.
625A214PEJ100009	0	MC	7707771533133	9991	Incorrect Features	Yes	Agree. System defect. Corrected problem on 5/20/00.
625A214PEJ100010	0	MC	6784419569837	9991	Incorrect Features	Yes	Agree. System defect. Corrected problem on 5/20/00.
625A214PEJ101002	0	MC	7067248881302	9991	Missing Features (HBY)	Yes	Agree. KPMG sent HBY in error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.

**BELLSOUTH'S RESPONSE TO EXCEPTION 76
(SECOND AMENDED)**

PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
625A214PTJ100008	0	MC	7067245832114	9991	Missing Features	Yes	Agree. System defect. Corrected problem on 5/20/00.
625A214PTJ100011	0	MC	7702269352130	9991	Incorrect Features	Yes	Agree. System defect. Corrected problem on 5/20/00.
626A224PEJ100015	0	MC	4043209327506	9991	Missing Features (HBY)	Yes	Agree. KPMG sent HBY in error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.
626A224PEJ101012	0	MC	6783667751725	9991	Missing Features (HBY)	Yes	Agree. KPMG sent HBY in error. PON should have been clarified back to KPMG. Feature # 9251 pending prioritization will add edit to send clarification.
626A224PTJ100007	6	MC	9127456926229	9991	LPIC not removed as ordered.	Yes	Agree. Service rep error.

**BELLSOUTH'S RESPONSE TO EXCEPTION 76
(SECOND AMENDED)**

CSR VERIFICATION							
Incorrect Address							
PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
301A212PEH100006	3	AA	404M382906906	9994	Incorrect address listing; Incorrect customer account number	No	Do not agree. Loops are not listed. Customer account number on CSR is correct
301A212PEH100008	1	AA	706U574638638	9994	Incorrect address listing; Incorrect customer account number.	No	Do not agree. Loops are not listed. Customer account number on CSR is correct
301A212PEH101001	2	AA	706U572929929	9994	Incorrect address listing; Incorrect customer account number	No	Do not agree. Loops are not listed. Customer account number on CSR is correct.
305A112PTH100007	1	AV	4049820492554	9994	Incorrect address listing (LN information)	No	Do not agree. TN is not listed as a result of no DIR request on LSR. Loops require a MISC account, which is not listed. Information reflected here came from the MISC account.
305A122PEH100013	0	AV	7707401850313	9994	Incorrect address listing (LN information)	No	Do not agree. TN is not listed as a result of no DIR request on LSR. Loops require a MISC account, which is not listed. Information reflected here came from the MISC account.
305A222PEH101001	6	AV	7068280181715	9994	Incorrect address listing	No	Do not agree. TN is not listed as a result of no DIR request on LSR. Loops require a MISC account, which is not listed. Information reflected here came from the MISC account.
305A222PEH101009	2	AV	7062957961726	9994	Incorrect address listing (LN information)	No	Do not agree. TN is not listed as a result of no DIR request on LSR. Loops require a MISC account, which is not listed. Information reflected here came from the MISC account.

**BELLSOUTH'S RESPONSE TO EXCEPTION 76
(SECOND AMENDED)**

PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
305A222PTH100010	1	AV	4049829274034	9994	Incorrect address listing on CSRQ (LN information)	No	Do not agree. TN is not listed as a result of no DIR request on LSR. Loops require a MISC account, which is not listed. Information reflected here came from the MISC account.
309A122PTH100008	0	AV	9127434147038	9994	Incorrect address listing	Yes	Do not agree. TN is not listed as a result of no DIR request on LSR. Loops require a MISC account, which is not listed. Information reflected here came from the MISC account.
317A122PTH100006	1	AM	706U090761761	9991	Incorrect address listing	No	Do not agree. TN is not listed as a result of no DIR request on LSR. Loops require a MISC account, which is not listed. Information reflected here came from the MISC account.
317A122PTH101001	0	AM	404M360050050	9991	Incorrect address listing	No	Agree. Service rep error. Incorrect grouping. Individual service rep covered 2Q00.
320A212PEF000008	0	JA	7702740804	9991	Incorrect address listing	No	Do not agree. Zip code provided on LSR was incorrect. System provided the correct zip code. BellSouth does not slow down the order process for an incorrect zip code we correct it and continue the process.

**BELLSOUTH'S RESPONSE TO EXCEPTION 76
(SECOND AMENDED)**

PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
384A225PTI100003	0	BV	6785790570	9992	Incorrect address listing	No	Unable to locate PON. This is an incorrect company code for REQ type.
395A213PEM100001	1	FA	7067247628	7050	Incorrect address listing	No	Do not agree. LSR and CSR agree.
428A124PEJ101009	0	MV	7707771988703	9994	Incorrect address listing (zip code)	Yes	Do not agree. Zip code provided on LSR was incorrect. System provided the correct zip code. BellSouth does not slow down the order process for an incorrect zip code. BellSouth will correct & continue the process.
428A124PTJ100014	0	MV	6785790866511	9994	Incorrect address listing (zip code)	Yes	Do not agree. Zip code provided on LSR was incorrect. System provided the correct zip code. BellSouth does not slow down the order process for an incorrect zip code. BellSouth will correct & continue the process.
432A214PTJ100004	5	MM	9127425789789	9991	Address did not change on Move order.	No	Agree. BellSouth did not follow process. Referred to manager to coordinate root cause investigation.
433A124PEJ101006	2	MM	9127508052443	9991	Incorrect address listing.	No	Do not agree. CSR address agrees with address on LSR. Incorrect LOC address (EU info), and incorrect billing address on 3/23/00 CSR.
433A124PTJ100001	1	MM	4046346772772	9991	Incorrect address listing. Move not completed; Incorrect MAN	No	Do not agree. Can provide copy of LSR and service order showing service in at floor number & changing back to original location.
601A222PTI000008	0	BV	7709338573	7727	Incorrect address listing.	No	Do not agree. TN CSR shows RWH Enterprises.
601A222PTI100002	0	BV	4049820283	8758	Incorrect address listing.	No	Do not agree. Please check loop CSR.
435C114PTJ002019	0	MT	6785790954	9991	Incorrect LOC listing; no ADL added	No	Do not agree. CSR LOC info agrees with LSR. KPMG did not order ADL

**BELLSOUTH'S RESPONSE TO EXCEPTION 76
(SECOND AMENDED)**

PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
350D222PTI100001	2	BV	6785799295	7050	Incorrect address listing on CSRQ	No	Do not agree. CSR address agrees with address on LSR. LN information changed from Hewlett Packard to MGC; EU information listed under S&E section correctly. Need additional information.
351A212PTI000001	3	BV	7709330248	8758	Incorrect address listing; Incorrect "Q" account.	No	Do not agree. This is a partial migration.
333A122PTI101001	1	BV	7062389184	9992	Incorrect address listing; Incorrect "Q" account	No	Do not agree. CSR address agrees with address on LSR. Q account is correct
606A123PEM101006	3	FC	6786249526	9991	Incorrect address listing	No	Do not agree. CSR address agrees with address on LSR.

BELLSOUTH'S RESPONSE TO EXCEPTION 76 (SECOND AMENDED)

CSR VERIFICATION							
Incorrect Provisioning							
PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
317A122PTH002004	0	AM	706U098477477	9991	Facilities were changed with no notification from BLS.	No	Agree. Service rep error.
395A213PTM100005	0	FA	7063780876	9994	Incorrect provisioned of cable pairs between lines on order.	Yes	Agree. Service rep human error. Not a training issue.
397A223PTM102002	0	FA	9127558205	9994	Incorrect provisioned of cable pairs between lines on order.	Yes	Agree. Service rep error.
398A213PTM100002	5	FV	7704423511	9994	No Ports provisioned; Incorrect LPIC; No 'Q' Account listed on CSR	No	Do not agree. This is a partial migration and ports are provisioned under (770) 442 3462.
402A223PEM001001	4	FV	7707518546	9994	No Ports on post CSR; No CC Listed; No Q account	No	Do not agree. Partial Migration sees: TN (770) 751-3634.
408A313PEM000002	0	FV	7068020367	9991	Missing lines; Incorrect Q account information	Yes	Agree. Missing (706) 802-1467. Service rep error.
409A223PTM100002	0	FC	9127425287	9991	Incorrect channel pair provisioned.	Yes	Do not agree. PON adding ESX only.
604A224PEJ000003	0	MV	7707773279	9991	Provisioning not completed.	Yes	Do not agree. Partial migration. See (770) 777-0986.
604A224PTJ000004	1	MV	7709800484	9994	Provisioning not completed.	No	Do not agree. Partial migration. See (770) 777-0986.
398A213PEM000003	2	FV	7062339636	9994	Provisioning not completed.	No	Do not agree. Partial migration. See (770) 777-0986.
603A224PEJ100003	0	MD	4043216049506	9991	Ordered partial Disco - Disconnected full account	Yes	Agree. This is a documentation issue. This process will be changed in Issue 9.
610A224PTJ100016	0	MC	9127437960229	9991	Ordered change TN - BLS added a line.	Yes	Agree. System processed incorrectly. Feature 9556 pending change control process.
412A213PTM000003	0	FSS	7704751021	9991	Service not suspended	No	Agree. Service rep error.
438A214PEJ000004	0	MSS	9127466851637	9991	Service not suspended	No	Agree. Provisioned incorrectly.

**BELLSOUTH'S RESPONSE TO EXCEPTION 76
(SECOND AMENDED)**

PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
801A215PTG100001	0	CW	4043214967	9991	Incorrect provisioning (line ordered disconnected – still active)	No	Unable to locate PON. Line was not migrated instead of disconnected.
402A223PTM000002	0	FV	6785790051	9994	Ordered Port – moved to resale; Partial Migration- BLS migrated entire order	No	Do not agree. Records show that two numbers migrated.
603A224PTJ100004	0	MD	7062953890255	9991	CSR Discrepancy- shows "FINAL" on order, only 1 line is disconnected of two.	Yes	Do not agree. Both lines on account are disconnected as requested on LSR.
305A122PEH102010	7	AV	7068280776	9994	Account should read "Final" but does not since migrating from BST.	No	Do not agree. D order completed 4/24. MA notice sent on original DD. Spoke with Terry at KPMG.

**BELLSOUTH'S RESPONSE TO EXCEPTION 76
(SECOND AMENDED)**

CSR VERIFICATION							
Other CSR Errors							
PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
305A212PTH100002	0	AV	7707409267221	9994	Post CSR reflects no UNEs.	No	Do not agree. Please check Loop CSR.
406A213PTM100002	1	FV	7707773250	9991	Wrong "Q" Account on CSR.	Yes	Do not agree. Q account on CSR is correct. Q account is different for Resale and UNE.
382D225PEG101005	1	CD	7062357582	9991	No Misc. account number (BAN2)	Yes	Do not agree. Q account 796Q974346 in billing section.
305A212PTF100013	0	JA	7702550806	9994	Missing RESH code on CSR	No	Do not agree. RESH code is not applicable for this order type. AECN would be appropriate for this service type. RESH is used on Resale.
305A212PTF101008	5	JA	4042140689	9994	Missing RESH code on CSR	No	Do not agree. RESH code is not applicable for this order type. AECN would be appropriate for this service type. RESH is used on Resale.
373A215PEG100002	2	CV	7062950832	9992	No "Q" account listed, No CC Listed on CSR; TN Mismatch	No	Do not agree. This PON was for a partial migration and (706) 295-0832 did not port.
374A225PEG100006	0	CV	7062959709	7050	Incorrect BAN1	Yes	Do not agree. Based upon CLEC database. This is the correct Q account for INP.
444A214PEJ000002	0	MD	7062347769744	9991	No "Q" account listed	Yes	Do not agree. CSR does reflect correct Q account. This account is final and final CSR reflects Q account.
406A213PEM100005	0	FV	4049296504	9991	Incorrect "Q" account on CSR.	Yes	Do not agree. CSR does reflect correct Q account. Q account for Resale and for UNE is different.
406A213PTM100004	0	FV	7068283771	9991	Incorrect "Q" account on CSR	Yes	Do not agree. CSR does reflect correct Q account. Q account for Resale and for UNE is different.

BELLSOUTH'S RESPONSE TO EXCEPTION 76 (SECOND AMENDED)

CSR VERIFICATION							
Incorrect Directory Listings (verified through CSR validation)							
PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
301A212PEF100002	1	JA	706U572929929	9994	Incorrect DL	No	Agree. Service rep error.
305A122PTH100012	0	AV	4049820347564	9994	Incorrect DL	Yes	Do not agree. TN CSR in final MISC Account shows LaVista Rd.
307A222PTF102015	2	JA	7063140805	9994	Incorrect DL	No	Do not agree. Listed as requested.
326A212PEI100003	2	BV	7062952450	9992	Incorrect DL	No	Agree. Service rep error.
326C222PEI100002	0	BV	7062952828	9992	Incorrect DL	Yes	Do not agree. CSR for DL agrees with LSR. The * is a listing instruction for the directory but will not print in the directory.
333A122PEI100003	0	BV	7062929565	9992	Incorrect DL	Yes	Do not agree. CSR for DL agrees with LSR. The * is a listing instruction for the directory but will not print in the directory.
349A212PEI000004	5	BV	4049829424	7050	Incorrect DL	No	Do not agree. CSR for DL agrees with LSR. Please check TN CSR Not Loop CSR
409A223PEM100003	0	FC	7709527166	9991	Incorrect DL	Yes	Agree. Service rep error
606A123PEM100002	0	FC	7062344197	9994	Incorrect DL	Yes	Agree. Service rep error
607A214PTJ101003	0	MC	7067227698203	9991	Incorrect DL	Yes	Agree. LSR did not include a valid line activity for DL. LEO IG was updated on 3/17/00 to clarify valid line activity codes for DL.
608A124PEJ101004	0	MC	7063689447255	9991	Incorrect DL	No	Agree. Service rep error
325C222PEI001001	3	BV	7062955413	9992	Incorrect DL	No	Do not agree. CSR for DL agrees with LSR.
435A114PTJ002002	0	MT	7707771941359	9991	No Directory Listing; No ADL added	No	Do not agree. Listed as (404) 325-1098.
403A223PEM100002	0	FV	7702269110	9994	Incorrect DL (out of order); Additional Line; Missing address information (RM & FLR#)	No	Unable to locate PON.
405A312PEM001002	5	FV	9127461378	9994	Incorrect DL (out of order); Additional feature (nxmcr).	No	Unable to locate PON.
452A216PEF100002	0	JR	7707775840	9991	Incorrect DL	No	Agree. Service rep error.
452A216PTF100003	0	JR	7067246195	9991	Incorrect DL	No	Agree. Service rep error.
453C126PEF100001	1	JR	4046399935	9991	Incorrect DL	No	Agree. Service rep error. Listing training has been

**BELLSOUTH'S RESPONSE TO EXCEPTION 76
(SECOND AMENDED)**

							completed for all reps.
607C214PEJ101010	0	MC	7707771445748	9991	Incorrect DL	Yes	Agree. LSR did not include a valid line activity for DL. LEO IG was updated on 3/17/00 to clarify valid line activity codes for DL.

BELLSOUTH'S RESPONSE TO EXCEPTION 76 (SECOND AMENDED)

Directory Listing Verification – (through BLS Directory Listing Database Validation)							
PON	VER	Req/ Act	TN	OCN	Directory Listing Discrepancy	F/T	BellSouth Response
350D222PTI100001	2	BV	6785799294	7050	Listed as Non-Published	N	Agree. Service rep error.
351A212PTI000001	3	BV	7709330793	8758	Address listed as "SE"	N	Agree. Service rep error.
403A223PEM100002	0	FV	7702260527	9994	Listing Not Found	N	Agree. Service rep error.
403A223PEM100004	0	FV	4043214029	9994	Wrong Name listed	Y	Agree. LSR did not include a valid line activity for DL. LEO IG was updated on 3/17/00 to clarify valid line activity codes for DL.
403A223PTM100003	0	FV	7067220159	9994	Listing Not Found	Y	Agree. Service rep error.
405A312PEM001002	5	FV	9127461378	9994	Name listed backwards	N	Agree. Service rep error.
452A216PEF100002	0	JR	7707775840	9991	Listed as Non-Published	N	Agree. Service rep error.
452A216PTF100003	0	JR	7067246195	9991	Listed as Non-Published	N	Unable to locate PON
453C126PEF100001	1	JR	4046399935	9991	Wrong Name listed	N	Agree. Service rep error.
455A116PTF100004	0	JR	7067241358	9991	Listing Not Found	N	Do not agree. Database listing agrees with LSR. Not in database when queried by KPMG
607C214PEJ101010	0	MC	6786241459	9991	Listing Not Found	Y	Agree. It is directory affecting. No directory appearance is the outcome of a listing being omitted in error. We agree that it is an error but do not agree with it being counted twice.
626A224PTJ101002	0	MC	7067244960	9991	Listed as Non-Published	Y	Agree. LSR did not include a valid line activity for DL. LEO IG was updated on 3/17/00 to clarify valid line activity codes for DL.
615A122PEF102017	1	JA	7702550802	9991	Incorrect Street Address	N	Agree. Service rep error.

**BELLSOUTH'S RESPONSE TO EXCEPTION 76
(SECOND AMENDED)**

PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
428A124PEJ100002	01	MV	6785790883	9994	Database listing does not indicate "non-listed"	Y	Unable to locate PON. CSR shows non-list. Database would have shown *
610A224PEJ100001	0	MC	7709561097	9991	Name listed backwards	N	Agree. Service rep error.
610A224PTJ100016	0	MC	9127551751	9991	Listing Not Found	Y	Agree. LSR did not include a valid line activity for DL. LEO IG was updated on 3/17/00 to clarify valid line activity codes for DL.
325C222PEI001001	3	BV	7062955413	9992	Listing Not Found	N	Agree. Service rep error

BELLSOUTH'S RESPONSE TO EXCEPTION 76 (SECOND AMENDED)

Switch Translation Verification							
PON	VER	Req/ Act	TN	OCN	Switch Translation Discrepancy	F/T	BellSouth Response
626A224PTJ100007	6	MC	9127456926	9991	Should not have a PIC or LPIC	Y	Agree. Service rep error.
625A214PTJ100012	0	MC	7062369570	9991	Missing PIC and Hunting	N	Agree. Service rep error.
625A214PTJ100012	0	MC	7062369644	9991	Missing PIC and Hunting	N	Agree. Service rep error. Duplicate PON. See (706) 236-9570 above.
625A214PTJ100008	0	MC	7067245832	9991	No Hunting	Y	Agree. System defect corrected problem on 5/20/00.
625A214PEJ101002	0	MC	7067248881	9991	No Hunting	Y	Same as below
625A214PEJ101002	0	MC	7067244105	9991	No Hunting	Y	Same as below
625A214PEJ101002	0	MC	7067241016	9991	No Hunting	Y	Agree. System defect corrected problem on 5/20/00.
625A214PEJ100005	3	MC	9127434571	9991	No Hunting	Y	Agree. System defect corrected problem on 5/20/00.
412A213PEM000002	0	FSS	9127424884	9991	Service not suspended	N	Agree. Service rep error.
409A223PTM100001	5	FC	7068280693	9991	No ESX	Y	Agree. ESX is not on the CSR. Received FOC and CN. Unable to retrieve PON. This is another instance of being charged twice for the same error.
403A223PTM100005	1	FV	7062350229	9994	No NSS	N	Same as below.
403A223PTM100005	1	FV	7062354725	9994	No NSS	N	Same as below.
403A223PTM100005	1	FV	7062358913	9994	No NSS	N	Agree. Service rep error.

BELLSOUTH'S RESPONSE TO EXCEPTION 76 (SECOND AMENDED)

PON	VER	Req/ Act	TN	OCN	CSR Discrepancy	F/T	BellSouth Response
625A214PEJ100010	0	MC	6784419569	9991	No HTY or HTG	Y	Same as below.
625A214PEJ100010	0	MC	6784419570	9991	No HTY or HTG	Y	Same as below.
625A214PEJ100010	0	MC	6784419571	9991	No HTY or HTG	Y	Agree. System defect. Corrected problem on 5/20/00.
625A214PEJ100009	0	MC	7707771529	9991	No HTY or HTG	Y	Same as below.
625A214PEJ100009	0	MC	7707771533	9991	No HTY or HTG	Y	Same as below.
625A214PEJ100009	0	MC	7707771534	9991	No HTY or HTG	Y	Agree. System defect. Corrected problem on 5/20/00.
428A224PTJ100002	1	MV	4046342861	9994	3 Way Call, Call Forwarding, Call Waiting	N	Agree. Service rep error.
412A213PTM000003	0	FSS	7704751021	9991	Service not suspended	N	Agree. Service rep error.
406A213PTM100002	1	FV	7707773250	9991	Requested LPIC 5124, Received default 9199	Y	Agree. Service rep error.
625A214PTJ100011	0	MC	7702260649	9991	No Hunting	Y	Same as below.
625A214PTJ100011	0	MC	7702269352	9991	No Hunting	Y	Same as below.
625A214PTJ100011	0	MC	7702269902	9991	No Hunting	Y	Agree. System defect. Corrected problem on 5/20/00.
402E223PTM000002	0	FV	7702268073	9994	No NSY	N	Same as below.
402E223PTM000002	0	FV	7702268258	9994	No NSY	N	LSR received by BST. Does not have NSY. Please provide FCIF.

Impact

Inaccurate provisioning will affect CLECs in the following way:

- **Decreased customer satisfaction.** If an account is not provisioned correctly, a CLEC's customer will receive the incorrect level or type of service. This will result in a decrease in CLEC customer satisfaction.

BELLSOUTH'S RESPONSE TO EXCEPTION 76 (SECOND AMENDED)

BellSouth Response

Many of the PONs provided in this exception contained similar discrepancies. BellSouth reviewed a large number of the PONs provided by KPMG in each category. BellSouth responses to individual PONs are included in the CSR Discrepancy column immediately below the KPMG note.

Summary of findings:

Category	Do not agree	Issue already corrected	Change pending prioritization	Service rep error	Unable to locate PON	Duplicate PON	Total PONs checked
Incorrect Features	4	9	11	2	1		27
Incorrect Address	12						12
Incorrect Provisioning	5		1	3			9
Other CSR Errors	5						5
Incorrect DL (through CSR validation)	5	2		7			14
DL Verification (through DL database validation)	6	2		11	3	1	23
Switch Translation Verification	6	6	1	7	1	1	22
Total PONs Checked	43	19	13	30	5	2	112

BellSouth's review of the sample PONs provided by KPMG and discussions regarding KPMG processes have revealed the following:

Of the 112 PONs reviewed, BellSouth found discrepancies on 62 PONs. Of the 62 PON discrepancies found, BellSouth changes already implemented would have prevented 19 (31%) of the discrepancies. BellSouth changes pending prioritization will prevent 13 (21%) of the discrepancies. Service rep training on directory listing orders was completed on 6/30/00 and will address another 25 (40%) of the discrepancies found.

KPMG has agreed to re-evaluate the PONs included in the Incorrect Address section. Based on the service type provisioned on the CSR, KPMG will look in the Service & Equipment Listed sections of the CSR to review the end user address.

KPMG incorrectly assumed the customer account code and Q account number provided on the PON would always be used by BellSouth. The Q account number used by BellSouth is returned to KPMG in the FOC. KPMG used directory assistance operator screen prints for the directory listing database validation section. KPMG's understanding of the screen prints is not accurate.

BELLSOUTH'S RESPONSE TO EXCEPTION 80 (AMENDED)



June 27, 2000

EXCEPTION REPORT

An exception has been identified as a result of the xDSL Functional Evaluation (PO&P12) and the Resale and xDSL Documentation Evaluation (PO&P14).

Exception:

BellSouth guidelines for submitting an order Service Inquiry (SI) and Loop Service Requests (LSR) do not provide complete, consistent information.

To request xDSL service for an end-user, CLECs submit order service inquiries (SIs) (to provide xDSL-capable loop information) and an LSR (to order xDSL service).

As part of xDSL testing, KPMG will submit order SIs and LSRs. In preparing to perform these testing activities, KPMG reviewed two BellSouth xDSL-related documents, *Unbundled ADSL Capable Loop & Unbundled HDSL Capable Loop - CLEC Information Package* and *BellSouth & Data CLECs Partnering for the Future*.

Based on these document reviews, KPMG discovered the following deficiencies:

Unbundled ADSL Capable Loop & Unbundled HDSL Capable Loop - CLEC Information Package:

- The document does not provide formal business rules for required information for the order SI.
- The document provides no reference between LSR and pre-order SI (Loop Make-up) forms, though submission of both forms is required to order xDSL service.
- The document does not provide details regarding the submission method for SI and LSR forms (e.g., fax and/or e-mail).

BellSouth & Data CLECs Partnering For The Future:

- The document provides no reference between the LSR and SI forms.
- While the document provides a process for the submission of SI/LSR forms, this process is not clear. For example, the process initially recommends submission of SIs and LSRs via fax and/or e-mail. However, on the subject of BellSouth's acknowledgements of SIs and LSRs, the description states that acknowledgments will occur via e-mail. Fax acknowledgements are not mentioned. Additionally, the process flow diagram only describes the use of a fax machine. No process flow diagram for e-mail is provided.

Impact

BELLSOUTH'S RESPONSE TO EXCEPTION 80 (AMENDED)

The absence of complete guidelines for submitting xDSL order service inquiries and loop service requests impacts CLECs in the following ways:

- **Increase in operating costs.** Without sufficient guidance regarding submission of these SIs and LSRs, CLECs attempting to order xDSL services will likely experience significant errors, requiring CLECs to re-submit flawed SIs and LSRs. Consequently, CLECs will have to utilize more resources to complete the xDSL ordering process, which will increase CLEC operating costs.
- **Decrease in CLEC customer satisfaction.** Additionally, errors in submitting SIs and LSRs could lead to delays in service provisioning for the CLECs end-user. Provisioning delays will result in a decrease in CLEC customer satisfaction.

BellSouth Response

The revised LMU and ADSL/HDSL Information Packages will resolve this concern. However, as has been the case since the ADSL/HDSL compatible loops have been developed, an ADSL or HDSL loop may be ordered without pre-order Loop Make-up by submission of a ADSL/HDSL SI and LSR. This is the current ordering procedure for ADSL and HDSL loops. The ADSL/HDSL SI and LSR are documented in the current Information Package.

BELLSOUTH'S RESPONSE TO EXCEPTION 103



August 10, 2000

EXCEPTION REPORT

The following exception has been identified as a result of the CRIS Resale Invoicing Functional Evaluation (BLG-7).

Exception:

The KPMG Consulting Test CLEC received invoices from BellSouth containing inaccurate information.

As part of the CRIS Resale Invoicing Functional Evaluation, KPMG Consulting compared DUF records for each telephone number (where test usage was generated) and the corresponding bills received from BellSouth for these numbers.

KPMG Consulting found that, in some cases, usage records were not billed when usage was generated. Additionally, some usage charges appeared on Test CLEC bills when usage was not generated.

The following are representative occurrences of missing or additional usage charges from KPMG Consulting Test CLEC bills.

<u>Telephone Number</u>	<u>Account Number</u>	<u>Date Of Call</u>	<u>Bill Date</u>	<u>Missing Usage Records</u>	<u>Incorrect Usage Records</u>
404-633-0247	770-Q59-4492-492	4/5/00	4/29/00	3	0
404-633-0247	770-Q59-4492-492	4/6/00	4/29/00	1	0
706-235-6343	706-Q59-4492-492	4/5/00	4/29/00	0	3

The call details corresponding to the table above are as follows.

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local automated operator serviced 3 rd party
Date of Call	4/5/00
To Place	Atlanta
To Number	404-799-9478
From Number	404-633-4121

BELLSOUTH'S RESPONSE TO EXCEPTION 103

KPMG Consulting Expected Results \$1.91
BellSouth Bill Not located on bill

Telephone Number 404-633-0247
Account Number 770-Q59-4492-492
Call Type Local operator completed collect
Date of Call 4/5/00
To Place Atlanta
To Number 404-633-0247
From Number 404-633-4121
KPMG Consulting Expected Results \$2.82
BellSouth Bill Not located on bill

Telephone Number 404-633-0247
Account Number 770-Q59-4492-492
Call Type Local operator completed collect
Date of Call 4/5/00
To Place Atlanta
To Number 404-633-0247
From Number 404-633-4121
KPMG Consulting Expected Results \$2.82
BellSouth Bill Not located on bill

Telephone Number 404-633-0247
Account Number 770-Q59-4492-492
Call Type Toll record with corresponding credit record
Date of Call 4/6/00
To Place Clayton
To Number 706-782-6488
From Number 404-633-0247
KPMG Consulting Expected Results \$0.19
BellSouth Bill Not located on bill

Telephone Number 706-235-6343
Account Number 770-Q59-4492-492
Call Type Toll
Date of Call 4/5/00
To Place Rome
To Number 706-235-6343
From Number 706-235-5762
KPMG Consulting Expected Results No usage charges expected
BellSouth Bill \$2.73

BELLSOUTH'S RESPONSE TO EXCEPTION 103

Telephone Number	706-235-6343
Account Number	770-Q59-4492-492
Call Type	Band 4, 2 Expanded Local Area calls
KPMG Consulting Expected Results	No usage charges expected
BellSouth Bill	\$0.26

Telephone Number	706-235-6343
Account Number	770-Q59-4492-492
Call Type	Local Call
KPMG Consulting Expected Results	7 Local calls
BellSouth Bill	8 Local calls

Impact

Issuing invoices containing inaccurate usage information will impact CLECs in the following ways:

- **Decrease in Revenue.** Missing usage charges on CLEC invoices may lead to underbilling of end users, which will result in reduced revenue for CLECs.
- **Decreased Customer Satisfaction.** Incorrect charges for usage that was not generated may result in CLECs inappropriately billing end users. Inappropriately billing end users will result in a decrease in CLEC customer satisfaction.
- **Increase in operating costs.** Regardless of the net monetary effect of incorrect charges upon CLEC bills, a CLEC may be forced to regularly reconcile these bills – identifying and correcting the incorrect charges and rectifying the inconvenience caused to its customers. The necessity of an extensive validation of each bill and facility will increase CLEC resource utilization, thereby increasing operating costs.

BellSouth Response

Telephone Number	404-633-0247
Account Number	770-Q59-4492-492
Call Type	Local automated operator serviced 3 rd party
Date of Call	4/5/00
To Place	Atlanta
To Number	404-799-9478
From Number	404-633-4121
KPMG Consulting Expected Results	\$1.91
BellSouth Bill	Not located on bill

BellSouth Reply Call was sent on ODUF

010131 000405 10 4046334121 000 10 4047999478 00022000 0000000 143

BELLSOUTH'S RESPONSE TO EXCEPTION 103

Due to age of the message, data files necessary to determine message final destination is not available.

Telephone Number 404-633-0247
Account Number 770-Q59-4492-492
Call Type Local operator completed collect
Date of Call 4/5/00
To Place Atlanta
To Number 404-633-0247
From Number 404-633-4121
KPMG Consulting Expected Results \$2.82
BellSouth Bill Not located on bill

Two Calls matching criteria was sent on ODUF

010131	000405	10	4046334121	000	10	4046330247	00033000	0000000	1429
010131	000405	10	4046334121	000	10	4046330247	00033000	0000000	1459

Due to age of the message, data files necessary to determine message final destination is not available.

Telephone Number 404-633-0247
Account Number 770-Q59-4492-492
Call Type Local operator completed collect
Date of Call 4/5/00
To Place Atlanta
To Number 404-633-0247
From Number 404-633-4121
KPMG Consulting Expected Results \$2.82
BellSouth Bill Not located on bill

Two Calls matching criteria was sent on ODUF

010131	000405	10	4046334121	000	10	4046330247	00033000	0000000	1429
010131	000405	10	4046334121	000	10	4046330247	00033000	0000000	1459

Due to age of the message, data files necessary to determine message final destination is not available.

BELLSOUTH'S RESPONSE TO EXCEPTION 103

Telephone Number 404-633-0247
Account Number 770-Q59-4492-492
Call Type Toll record with corresponding credit record
Date of Call 4/6/00
To Place Clayton
To Number 706-782-6488
From Number 404-633-0247
KPMG Consulting Expected Results \$0.19
BellSouth Bill Not located on bill

Two Calls matching criteria was sent on ODUF. **Note: Calls should have canceled each other out but both dropped.**

010101	000406	10	4046330247	000	10	7067826488	00004800	0000000	091
030101	000406	10	4046330247	000	10	7067826488	00000000	0000000	091

Telephone Number 706-235-6343
Account Number 770-Q59-4492-492
Call Type Toll
Date of Call 4/5/00
To Place Rome
To Number 706-235-6343
From Number 706-235-5762
KPMG Consulting Expected Results No usage charges expected
BellSouth Bill \$2.73

This call was not sent to KPMG on ODUF. A trouble ticket has been issued to determine why call was not sent to KPMG and to correct any problems uncovered.

The bill number is 706-Q59-4492-492 not 770. This is a Macon account and is found on the 706 account. The call billed correctly and can be found on the bill as item number 65.

65. APR 5 324P ROME GA 706 235-6343 ROME GA 706 235-5762 DS 2.73

BELLSOUTH'S RESPONSE TO EXCEPTION 103

Telephone Number 706-235-6343
Account Number 770-Q59-4492-492 (706-Q59-4492-492)
Call Type Band 4, 2 Expanded Local Area calls
KPMG Consulting Expected Results No usage charges expected
BellSouth Bill \$0.26

Customer subscribes to GA Community Caller Plus. Per the GA Tariff the customer is charged for all calls outside the Basic Local Calling Area. Billed charges for these calls are correct. Billed as follows.

-DAY- -NIGHT/WKND-

	Total		Total		
Band	Calls	Mins	Calls	Mins	Charges
4	2	3	0	0	.32
					.32

67. Local Usage Summary

68. Resale Discount at 17.30% for Business

TOTAL REGULATED LOCAL USAGE .26

TOTAL NONREGULATED LOCAL USAGE .00

TOTAL LOCAL USAGE .26

Telephone Number 706-235-6343
Account Number 770-Q59-4492-492 (706-Q59-4492-492)
Call Type Local Call
KPMG Consulting Expected Results 7 Local calls
BellSouth Bill 8 Local calls

One call was not sent to KPMG on ODUF. A trouble ticket has been issued to determine why call was not sent to KPMG and to correct any problems uncovered.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 35



August 11, 2000

EXCEPTION REPORT

The following observation has been made as a result of the CRIS/CABS Functional Test (BLG-1).

Exception:

BellSouth issued multiple bills containing erroneous charges to KPMG.

As a result of billing transaction tests, BellSouth issued bills associated with a variety of service activities to the KPMG CLEC. Multiple bills received by KPMG contain erroneous information, such as: 1) Undocumented charges; 2) Incorrectly rated charges; and 3) Missing charges.

Undocumented Charges

USOC VE1R2: BellSouth billed the KPMG CLEC a one-time charge of \$12.60 for a UNE service component identified by the Universal Service Order Code (USOC) VE1R2 (Virtual Expanded Interconnection). USOC VE1R2 is not defined in applicable BellSouth tariffs or in rate spreadsheets created for the KPMG CLEC in lieu of an Interconnection Agreement.

Representative occurrences of this error are found on the following invoices:

<u>Telephone Number</u>	<u>Account Number</u>	<u>Invoice Date</u>
770 933-9530	770 Q85 8252-252	10/05/99
770 933-0190	770 Q85 8252-252	10/05/99

Incorrectly Rated Charges

USOC UEPLX: BellSouth inappropriately billed the KPMG CLEC for the one-time charge for Universal Service Order Code (USOC) UEPLX, Unbundled Voice Grade Loop. This USOC is listed in the rate spreadsheets created for the KPMG CLEC in lieu of an Inter-Connection Agreement with the following rates:

- \$42.54 Non-recurring charge for the first service
- \$31.33 Non-recurring charge for each additional service

Review of the invoice shows that BellSouth billed the KPMG CLEC the following:

- \$42.54 Non-recurring charge for the first service
- \$42.54 Non-recurring charge for each additional service.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 35

Representative occurrences of this error are found on the following invoices:

<u>Telephone Number</u>	<u>Account Number</u>	<u>Invoice Date</u>
404 633-5740	770 Q97 9808 808	10/17/99
404 633-5251	770 Q97 9808 808	10/17/99

Missing Charges

USOC UEAL2: BellSouth did not bill the KPMG CLEC for the one-time charge for Universal Service Order Code (USOC) UEAL2, Unbundled Voice Grade SL1 Loop. This USOC is listed in the rate spreadsheets created for the KPMG CLEC in lieu of an Inter-Connection Agreement with the following rates:

- \$42.54 Non-recurring charge for the first service
- \$31.33 Non-recurring charge for each additional service

Review of the invoice shows that BellSouth did not bill the KPMG CLEC for these charges when applicable. Representative occurrences of this error are found on the following invoices:

<u>Circuit</u>	<u>Account Number</u>	<u>Invoice Date</u>
40.TYNU.526413	770 Q85 4226 226	10/05/99
40.TYNU.526414	770 Q85 4226 226	10/05/99

Unbilled Unbundled Loop: The KPMG CLEC submitted a Local Service Request to BellSouth for the migration of two SL1 Unbundled Analog Loops PON B141. The two Loops ordered had the following circuit IDs:

50.TYNU.000337...SB
50.TYNU.000338...SB

Of the two SL1 Loops ordered, only the circuit 50.TYNU.000337...SB appeared on the 10/5/99, 11/5/99 and 12/5/99 invoices¹ of the 706-Q85-4226-226 account. For the second circuit, BellSouth did not bill the appropriate monthly-recurring, pro-rated and non-recurring charges for the USOCs UEAL2 and UEAC2.

Impact

Issuing bills containing erroneous information will have the following effect on CLECs:

- **Altering expected operating costs.** All applicable charges should appear in Interconnection Agreements or in BellSouth Intra-State or Inter-State tariff documentation. By not adhering to documented rates, BellSouth potentially alters a

¹ KPMG reviewed bills for at least two cycles per PON. In some cases, when data was available, KPMG reviewed bills for 3 cycles.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 35

CLEC's expected operating costs, and could affect CLEC budgetary planning and related activities.

Increased operating costs. Regardless of the net monetary effect of incorrect charges upon a CLEC's bills, a CLEC will be forced to regularly reconcile these bills by identifying and correcting the incorrect charges and discovering and disaggregating mislabeled charges. The necessity of an extensive validation of each bill.

BellSouth Response

Undocumented Charges:

USOC VE1R2: The standard agreements refer to the applicable tariffs if specific rates are not provided in the contracts. For Virtual Collocation, that tariff is the F.C.C. Tariff No. 1. However, no service comparable to a DS0 cross-connect is described in that Tariff. To resolve this gap, rates for this specific USOC were developed by the Virtual Interconnection Product Team. A non-recurring rate of \$12.60 per month was authorized for use when this service was ordered by and provisioned for a customer.

Incorrectly Rated Charges:

BellSouth is currently developing the system capability and process capability to support a two-tier pricing structure for SL1 services. This will include an update to LCSC Methods and Procedures and a system enhancement. The system enhancement is currently being developed so a firm timeframe has not been established. However, it should occur during 4Q00.

Missing Charges:

USOC UEAL2: When the order that added these circuits was processed, the UEAL2 USOC was updated to the CRIS rate tables only for residence classes of service. The accounts which contain these USOCs are defined as business accounts. As such, the rate defaulted to zero. The USOC was added to the CRIS rate file for business classes of service on 2/23/00. This corrected the rates so that on a going forward basis, the proper rates will be used for non-recurring charges.

Unbilled Unbundled Loop: The billing system never received a service order that contained the circuit - 50.TYNU.000338..SB during the dates of the test. The service order, NPF3K268, that established this circuit completed 3/1/00. The service order that added the circuit - 50.TYNU.000337..SB did not have the circuit - 50.TYNU.000338..SB on the order. The two circuits on that order were 50.TYNU.000336..SB and 50.TYNU.000337..SB.

BellSouth and KPMG have attempted to replicate this issue, but were unsuccessful. A possible cause for the missing circuit ordered in 1999 could not be identified due to the age of the service orders and the purging of historical data.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 35

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 73



August 16, 2000

EXCEPTION REPORT

An exception has been identified as a result of the CRIS/CABS Invoicing Documentation Test (BLG-5).

BellSouth's CRIS/CABS billing documentation is deficient in the breadth and depth of topical coverage.

The CRIS/CABS Invoicing Documentation test (BLG-5) evaluated billing documentation provided by BellSouth for use by the CLECs¹. The objective of this test was to determine whether the billing documentation provided by BellSouth adequately supports the CLECs in handling BellSouth-provided CRIS/CABS bills.

KPMG reviewed of the breadth and depth of topical coverage contained in CRIS/CABS documentation. Topics considered were:

- Understanding Billing
- Receiving and Processing Bills
- Validating Bills
- Processing Credits and Adjustments
- Getting Help

During testing, KPMG determined that BellSouth's billing documentation was insufficient to support bill validation in the following ways:

1. The documentation does not provide comprehensive information on charges and fees.
2. Information defining the various sections of an invoice is not included in the documentation.
3. The documentation provides an inadequate number of bill samples.
4. Information on charge calculations, such as usage and pro-rated fractional charges, is not included in the documentation.
5. Information regarding obtaining and interpreting a Customer Service Record (CSR) is not included in the documentation.
6. Universal Service Order Code (USOC) information is provided; however, this information is incomplete.

¹ CRIS (Customer Record Information System) and CABS (Carrier Access Billing System) are BellSouth invoicing systems which provide information to CLECs for a variety of re-sale and UNE products.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 73

Impact

Deficient CRIS/CABS billing documentation impacts CLECs in the following ways:

Increase in operating costs. Deficient documentation will result in a more difficult and time-consuming billing process for the CLECs, requiring more labor resources and increasing operating costs.

Decrease in Customer Satisfaction. Deficient billing documentation will likely result in errors to CLEC customers. Incorrectly billing end-users will result in a decrease in CLEC customer satisfaction.

BellSouth Response

1. The documentation provided to CLECs for invoices is not intended to provide product or service specific information pertaining to charges or fees for such services. Information as to what charges the CLEC should expect for each service ordered from BellSouth can be found in either the tariffs filed with the Georgia PSC and FCC or the interconnection agreement or other product documentation as BellSouth may elect to publish.
2. BellSouth reviewed its documentation and included a general description of the bill sections for each of the types of bills produced. For bills formats using the guidelines developed at the Ordering and Billing Forum (OBF), proprietary agreements preclude BellSouth from providing CLECs with the detail record layouts, field definitions or other information owned by other companies. BellSouth published a CLEC Billing Guide on the Interconnection WEB site. Version 2 of the CLEC Billing Guide, which contained bill layouts, bill sections, and their descriptions, was published 6/16/00.
3. BellSouth reviewed its documentation and included additional samples of bills provided to CLECs. However, as stated in the reply to issue 1 above, the billing documentation is not intended to provide a CLEC with information on the billing of each type of service which could be ordered from BellSouth. Also, as stated above, the publication date for version 2 of the CLEC Billing Guide, which contained bill layouts and their descriptions, was 6/16/00.
4. BellSouth reviewed its documentation and included additional information on how charges are calculated for pro-rated fractional charges and a general description of the aggregation and calculation of usage charges. The publication date for Understanding Your Bill was 7/28/00, which addressed the calculation and aggregation of charges.
5. Obtaining live CSR data is not a function of the billing processes established by BellSouth. Delivery of an as rendered CSR with the bill, was addressed in the CLEC Billing Guide published on 6/16/00.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 73

6. BellSouth requires additional details describing this issue. A description for each USOC used by BellSouth, which represents a service being ordered, provisioned and billed, can be found on the bill/CSR provided on the monthly basis. Again, as stated above, the publication date for version 2 of the CLEC Billing Guide, which will contain bill/CSR layouts and their descriptions, was 6/16/00.

The WEB address for the all Billing Documentation referenced above is:
http://www.interconnection.bellsouth.com/guides/other_guides.html

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 73

Overall CLEC Billing Guide Publication Information:

The initial publication of the BellSouth CLEC Billing Guide was 6/1/00. The initial version contains information to address the following topics:

- Billing Introduction
- Billing Overview
- Billing Process Flow
- Daily Processing
- Bill Period Processing
- Bill Formatting, Media, and Delivery Options
- Electronic Bill Products
- ADUF
- ODUF
- EODUF
- Billing Terminology
- Frequently Asked Questions

Version 2 of the BellSouth CLEC Billing Guide was published on 6/16/00. Version 2 added bill/CSR layouts, bill sections and their descriptions.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 94



August 18, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Resale Usage Functional Evaluation (BLG8).

Exception:

BellSouth failed to deliver 20% of expected resale DUF records to KPMG.

During the period of April 4 – 7, 2000 KPMG executed 898 test call scenarios for the Resale Usage Functional Evaluation¹. BellSouth failed to deliver DUF² records for twenty percent of the test calls for which records were expected. Representative occurrences of calls with no corresponding DUF record are detailed in the following tables.

Intralata Toll

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Response
912-743-7339	912-892-2517	912-892-2517	4/5/2000	09:17:28	0001:28.0	1. Call does not bill to KPMG Resale number therefore it should not be sent to them ove ODUF for the resale test.
912-744-0639	912-453-8383	912-743-9678	4/6/2000	13:53:00	0001:12.0	2. Call was sent to KPMG on 4/11/00
912-745-2140	912-453-3999	912-745-2140	4/6/2000	14:10:11	0000:18.0	3. Call was sent to KPMG on 4/11/00
770-226-0815	706-563-4440	770-226-0483	4/6/2000	10:28:00	0001:00.0	4. Verbatim-Call at 10300205 Call was dropped because call incomplete and/or unbillable p the tariff.
770-226-9019	706-571-3456	770-226-9019	4/6/2000	10:37:02	0001:38.0	5. Did not find call on Verbat
770-690-0761	706-596-8244	770-690-0761	4/6/2000	13:16:00	0000:50.0	6. Verbatim-Call at 131645 C was dropped because call is incomplete and/or unbillable p the tariff.)

¹ 898 test call scenarios were introduced into the test with the expectation that 576 calls would generate corresponding DUF records. 312 of the test call scenarios were not expected to generate DUF records.

² Optional Daily Usage Files (ODUF) provide competitive local exchange carriers with records of billable measured intraLATA local and toll calls, per use/per activation services, and directory assistance messages. Enhanced Optional Daily Usage Files (EODUF) provide competitive local exchange carriers with records of local calls originating from resold Flat Rate Business and Residential lines.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 94

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Response
706-235-5431	770-832-0539	706-802-0193	4/6/2000	09:59:50	0001:56.0	7. Verbatim-Call at 1001021 Call was dropped because call incomplete and/or unbillable p the tariff.
706-235-5762	770-832-6100	706-235-5762	4/6/2000	09:43:00	0001:27.0	8. Verbatim-Call at 0944111 Call was dropped because call incomplete and/or unbillable p the tariff.
706-235-5762	770-832-6100	706-235-5762	4/6/2000	10:18:00	0002:46.0	9. Verbatim-Call at 1017566 Call was dropped because call incomplete and/or unbillable p the tariff.
404-633-0247	706-782-6488	404-633-4121	4/6/2000	09:27:31	0000:35.0	10. Call Sent on ODUF 04/10/00 CTime 926210 Another call Ctime 92807 was dropped because call is incomplete and/or unbillable p the tariff.
404-633-0247	706-783-6488	404-633-0247	4/6/2000	09:34:11	0002:25.0	11. Not on Verbatim- Found Term # 706-782-6488 found, Call was dropped because call incomplete and/or unbillable p the tariff.
404-633-6560	706-782-6100	706-782-6100	4/6/2000	13:46:16	0001:03.0	12. Call does not billed to a KPMG Resale number therefor it should not be sent to them over ODUF

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 94

Local (Operator Assisted/Completed)

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Response
912-743-7339	912-743-6502	912-743-7339	4/5/2000	16:13:17	0000:31.0	13. (flat rate) Verbatim-Call at 161317 (Alpha passed 21 Call was dropped because call is incomplete and/or unbillable per the tariff.
912-743-9678	912-745-0679	912-743-9678	4/6/2000	12:34:20	0001:03.0	14. Verbatim-Call at 1235417 Call was dropped because call is incomplete and/or unbillable per the tariff.
912-744-0639	912-742-2085	912-744-0639	4/6/2000	12:41:50	0001:00.0	15. Verbatim-Call at 1235417 Call was dropped because call is incomplete and/or unbillable per the tariff.
770-226-0483	770-226-9019	770-226-0483	4/6/2000	15:03:21	0001:44.0	16. Verbatim Call at 150431 Ca was dropped because call is incomplete and/or unbillable per the tariff.
770-226-0815	678-532-6698	770-226-0815	4/5/2000	13:57:00	0002:00.0	17. Verbatim Call at 135736 Fl Rate Account. Call was dropped because call is incomplete and/o unbillable per the tariff.
770-226-9019	770-933-9532	770-226-9019	4/5/2000	14:40:20	0000:50.0	18. Verbatim Call at 144106 Fl Rate Account. Call was dropped because call is incomplete and/o unbillable per the tariff.
706-235-5431	706-235-5762	706-235-5431	4/5/2000	15:36:10	0001:20.0	19. Did not find call as shown on Verbatim. Call at 15:25:01 but was DDD. No Operator calls found. Call at 15:25:01 sent out on ODUF
706-235-5762	706-802-0193	706-235-5431	4/5/2000	15:45:00	0001:12.0	20. Verbatim shows call at 153829 to Operator. Call was sent on ODUF
706-235-5762	706-802-0193	706-235-5762	4/5/2000	15:49:00	0001:14.0	21. Verbatim Call at 154925 Cal was dropped because call is incomplete and/or unbillable per the tariff.
404-633-0247	404-633-4761	404-633-4761	4/5/2000	14:10:15	0002:28.0	22. Verbatim Call at 140832 sen on ODUF 4/7/00. No recording for collect calls to this number found on verbatim.*.
404-633-4121	404-296-5519	404-633-4121	4/5/2000	14:47:12	0000:33.0	23. Verbatim Call at 144718 Cal was dropped because call is incomplete and/or unbillable per the tariff
404-633-6560	404-296-5519	404-633-6560	4/6/2000	13:18:50	0001:33.0	24. Verbatim Call at 131857 Cal was dropped because call is incomplete and/or unbillable per the tariff

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 94

Credit Requests³

From Number	To Number	Bill-To Number	Call Date	Connect Time	Duration	BellSouth Response
404-633-6560	404-222-9412		4/5/2000	14:00:13	0001:17.0	32. Call not found on Verbatim
404-633-6560	404-296-5519		4/6/2000	10:02:58	0000:47.0	33. Call not found on Verbatim
912-744-0639	912-742-2085		4/6/2000	10:49:00	0000:10.0	34. Billing System passed 200 Mass record type created from CT189. Work Request in progress to pass CT 189 to ODU
770-690-0761	706-596-8244		4/6/2000	13:05:00	0001:00.0	35. Billing System passed 200 Mass record type created from CT189. Work Request in progress to pass CT 189 to ODU.
770-951-5592	706-576-3400		4/6/2000	13:14:26	0000:50.0	36. Billing System passed 200 Mass record type created from CT189. Work Request in progress to pass CT 189 to ODU. progress to pass 189 to ODU

Impact

Failure to deliver DUF records impacts CLECs in the following ways:

- **Decrease in revenue.** If BellSouth does not deliver billable DUF records, CLECs cannot bill end users appropriately, which results in decreased revenue.
- **Inaccurate forecasting.** If all billable records are not delivered, CLECs are unable to reliably forecast usage and project revenue.

Additional BellSouth Response

BellSouth sent all billable usage to KPMG on ODU during this test except for three credit type records. It was discovered during this test, that one of the systems that processes toll type calls was not passing credit records to ODU. A work request has been issued to pass these credit type records to the ODU process. BellSouth will also update our ODU documentation for CLECs to clarify what types of messages will be sent over ODU for RESALE customers.

For calls that were dropped as incomplete or unbillable per the tariff, below are the drop reason:

- Call dropped because call is incomplete (not answered).
- Call dropped because call qualified to a Flat Rate calling plan.
- Service Feature not tariffed in State

³ The test caller received confirmation from the operator that a credit would be issued.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 35



August 17, 2000

EXCEPTION REPORT

The following observation has been made as a result of the CRIS/CABS Functional Test (BLG-1).

Exception:

BellSouth issued multiple bills containing erroneous charges to KPMG.

As a result of billing transaction tests, BellSouth issued bills associated with a variety of service activities to the KPMG CLEC. Multiple bills received by KPMG contain erroneous information, such as: 1) Undocumented charges; 2) Incorrectly rated charges; and 3) Missing charges.

Undocumented Charges

USOC VE1R2: BellSouth billed the KPMG CLEC a one-time charge of \$12.60 for a UNE service component identified by the Universal Service Order Code (USOC) VE1R2 (Virtual Expanded Interconnection). USOC VE1R2 is not defined in applicable BellSouth tariffs or in rate spreadsheets created for the KPMG CLEC in lieu of an Interconnection Agreement.

Representative occurrences of this error are found on the following invoices:

<u>Telephone Number</u>	<u>Account Number</u>	<u>Invoice Date</u>
770 933-9530	770 Q85 8252-252	10/05/99
770 933-0190	770 Q85 8252-252	10/05/99

Incorrectly Rated Charges

USOC UEPLX: BellSouth inappropriately billed the KPMG CLEC for the one-time charge for Universal Service Order Code (USOC) UEPLX, Unbundled Voice Grade Loop. This USOC is listed in the rate spreadsheets created for the KPMG CLEC in lieu of an Inter-Connection Agreement with the following rates:

- \$42.54 Non-recurring charge for the first service
- \$31.33 Non-recurring charge for each additional service

Review of the invoice shows that BellSouth billed the KPMG CLEC the following:

- \$42.54 Non-recurring charge for the first service
- \$42.54 Non-recurring charge for each additional service.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 35

Representative occurrences of this error are found on the following invoices:

<u>Telephone Number</u>	<u>Account Number</u>	<u>Invoice Date</u>
404 633-5740	770 Q97 9808 808	10/17/99
404 633-5251	770 Q97 9808 808	10/17/99

Missing Charges

USOC UEAL2: BellSouth did not bill the KPMG CLEC for the one-time charge for Universal Service Order Code (USOC) UEAL2, Unbundled Voice Grade SL1 Loop. This USOC is listed in the rate spreadsheets created for the KPMG CLEC in lieu of an Inter-Connection Agreement with the following rates:

- \$42.54 Non-recurring charge for the first service
- \$31.33 Non-recurring charge for each additional service

Review of the invoice shows that BellSouth did not bill the KPMG CLEC for these charges when applicable. Representative occurrences of this error are found on the following invoices:

<u>Circuit</u>	<u>Account Number</u>	<u>Invoice Date</u>
40.TYNU.526413	770 Q85 4226 226	10/05/99
40.TYNU.526414	770 Q85 4226 226	10/05/99

Unbilled Unbundled Loop: The KPMG CLEC submitted a Local Service Request to BellSouth for the migration of two SL1 Unbundled Analog Loops PON B141. The two Loops ordered had the following circuit IDs:

50.TYNU.000337...SB
50.TYNU.000338...SB

Of the two SL1 Loops ordered, only the circuit 50.TYNU.000337...SB appeared on the 10/5/99, 11/5/99 and 12/5/99 invoices¹ of the 706-Q85-4226-226 account. For the second circuit, BellSouth did not bill the appropriate monthly-recurring, pro-rated and non-recurring charges for the USOCs UEAL2 and UEAC2.

Impact

Issuing bills containing erroneous information will have the following effect on CLECs:

- **Altering expected operating costs.** All applicable charges should appear in Interconnection Agreements or in BellSouth Intra-State or Inter-State tariff documentation. By not adhering to documented rates, BellSouth potentially alters a

¹ KPMG reviewed bills for at least two cycles per PON. In some cases, when data was available, KPMG reviewed bills for 3 cycles.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 35

CLEC's expected operating costs, and could affect CLEC budgetary planning and related activities.

Increased operating costs. Regardless of the net monetary effect of incorrect charges upon a CLEC's bills, a CLEC will be forced to regularly reconcile these bills by identifying and correcting the incorrect charges and discovering and disaggregating mislabeled charges. The necessity of an extensive validation of each bill.

BellSouth Response

Undocumented Charges:

USOC VE1R2: The standard agreements refer to the applicable tariffs if specific rates are not provided in the contracts. For Virtual Collocation, that tariff is the F.C.C. Tariff No. 1. However, no service comparable to a DS0 cross-connect is described in that Tariff. To resolve this gap, rates for this specific USOC were developed by the Virtual Interconnection Product Team. A non-recurring rate of \$12.60 per month was authorized for use when this service was ordered by and provisioned for a customer.

BellSouth has plans to add the USOC VE1R2 to the standard agreement. This should be completed by 4Q00. BellSouth did investigate and determine that no CLECs, other than the third party test CLEC, has ever been billed for this USOC.

Incorrectly Rated Charges:

BellSouth is currently developing the system capability and process capability to support a two-tier pricing structure for SL1 services. This will include an update to LCSC Methods and Procedures and a system enhancement. The system enhancement is currently being developed so a firm timeframe has not been established. However, the implementation should occur during 4Q00.

Missing Charges:

USOC UEAL2: When the order that added these circuits was processed, the UEAL2 USOC was updated to the CRIS rate tables only for residence classes of service. The accounts which contain these USOCs are defined as business accounts. As such, the rate defaulted to zero. The USOC was added to the CRIS rate file for business classes of service on 2/23/00. This corrected the rates so that on a going forward basis, the proper rates will be used for non-recurring charges.

Unbilled Unbundled Loop: The billing system never received a service order that contained the circuit - 50.TYNU.000338..SB during the dates of the test. The service order, NPF3K268, that established this circuit completed 3/1/00. The service order that added the circuit - 50.TYNU.000337..SB did not have the circuit - 50.TYNU.000338..SB on the order. The two circuits on that order were 50.TYNU.000336..SB and 50.TYNU.000337..SB.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 35

BellSouth and KPMG have attempted to replicate this issue, but were unsuccessful. A possible cause for the missing circuit ordered in 1999 could not be identified due to the age of the service orders and the purging of historical data.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 91



August 18, 2000

EXCEPTION REPORT

An exception has been identified as a result of the CRIS/CABS Invoicing Functional Test (BLG-1).

Exception:

BellSouth incorrectly billed KPMG CLEC for usage charges for messages processed in the Augusta central office.

The KPMG CLEC generated local, toll, long distance and operator-assisted usage in executing the ADUF/ODUF¹ Functional Usage Test – BLG-2. The usage test was conducted from five BellSouth central offices during the three-day period from November 18 to November 20, 1999. The KPMG CLEC received EMI² records, which reflected usage that was captured by BellSouth during the test period and the corresponding invoices. The following invoices from the Augusta central office (AGSTGAMT72C):

<u>Q-Account Number</u>	<u>Invoice Date</u>
706Q858252-99339	December 5, 1999
706Q979808-99351	December 17, 1999
706Q858252-00005	January 5, 2000

KPMG checked the invoices to verify that: 1) the usage agreed with the EMI records; 2) the rates used agreed with the rates published in the rate sheet provided to KPMG by BLS in lieu of an Interconnection Agreement; and 3) the additions and extensions on the invoices were mathematically correct.

KPMG determined that invoice rates were correct but that the billed amount was incorrect because of discrepancies in usage quantities appearing on the invoice. KPMG observed variances between billed usage and usage reported by EMI in every category tested, except switching and transport-related rate elements. KPMG applied the

¹ Access Daily Usage Files (ADUF) provide competitive local exchange carriers with records of intraLATA/interLATA calls originated from or terminated to CLEC end user lines. Optional Daily Usage Files (ODUF) provide competitive local exchange carriers with records of billable measured intraLATA local and toll calls, per use/per activation services, directory assistance messages and WATS & 800 service calls.

² EMI – Exchange Message Interface is a standard developed by the Message Processing Committee of the Alliance for Telecommunications Industry Solutions' (ATIS) Ordering and Billing Forum (OBF). This standard is an industry guideline for the format of information regarding ordering, billing, and provisioning of services.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 91

BellSouth algorithm to calculate the invoice accuracy metric³. This calculation demonstrates a 723% under-billing.

The single largest cause of the error was the Operator Call Handling element (700 of the 723 percentage point total). The EMI records reported 31 operator-handled minutes-of-use; BellSouth billed 0 minutes-of-use.

The following table details variances between usage billed by BellSouth and usage reported per EMI records.

KPMG DUF Analysis Comparison to BellSouth KPMG CLEC Billing

Office – AGSTGAMT72C Billing Elements	Usage Per EMI Records	Usage Per BellSouth Invoice	Usage Variance	Rate	Billed Amount Per KPMG	Billed Amount Per BellSouth	Billing Variance	Accuracy Metric ³ (Total Only)
ULS-SF – Total MOU [Unbundled Local Switching (Switching Functionality)]	1224	1228	0	0.0016333	N/A	N/A	N/A	-
ULS-SF – Initial MOU	242	242	0	0.0016333	0.43	0.43	0.00	-
ULS-SF – Addtl MOU	986	986	0	0.0016333	1.63	1.63	0.00	-
ULS-TP [Unbundled Local Switching (Trunk Port)]	64	64	0	0.0001564	0.09	0.09	0.00	-
UIT-S – mileage [Unbundled Transport (Shared Transport)]	N/A	45	N/A	0.000008	N/A	0.09	N/A ⁴	-
UIT-S – fixed [Unbundled Transport (Facilities Termination)]	41	41	0	0.0004152	0.05	0.05	0.00	-
UTS-SF [Unbundled Transport (Tandem Switching)]	41	41	0	0.0006757	0.05	0.05	0.00	-
UTS-TP [Unbundled Transport (Tandem Switching – Trunk Port)]	62	62	0	0.0002126	0.07	0.07	0.00	-
800 Access Ten Digit Screening	63	68	5	0.0004868	0.03	0.04	0.01	-

³ ((Total Billed Revenue – Total Adjustments[Variance])/Total Billed Revenues) X 100 – This is invoicing accuracy metric as defined in the Georgia Master Test Plan (Appendix D2).

⁴ The data elements to support validation of mileage-based charges do not exist in the EMI record format and, therefore, were excluded from the overall variance calculation.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 91

Operator Call Handling	31	0	31	0.9680296	30.01	0.00	30.01	-
Automated Call Handling	9	0	9	0.0776409	0.70	0.00	0.70	-
Verification	4	1	3	0.921083	3.68	0.92	2.76	-
Interrupt	3	1	2	0.921083	2.76	0.92	1.64	-
DACC	5	0	5	0.0348712	0.17	0.00	0.17	-
Total (All Billing Elements)					39.67	4.29	35.29	-723%

Impact

Issuing bills containing erroneous usage information impacts CLECs in the following ways:

- Hampers capacity management efforts. **Under-reporting of usage activity may impede a CLEC's ability to adequately assess network requirements.**
- Distorts financial planning and rate setting. A CLEC's ability to accurately project revenue and expenses and to set rates for its customers is based, in part, on accurate billings from BellSouth.

BellSouth Response

BellSouth was able to determine the specific source of the discrepancies for the billing variances for two of the billing elements referenced above: Operator Call Handling and Automated Call Handling. For the remaining billing elements, we are not able to complete the investigation due to the retention period of our historical records.

The investigation determined that during the November time frame, there were multiple service orders issued against these line numbers. The service order activity resulted in usage guides that were not always properly assigned, and identified, as belonging to KPMG (a facilities based provider). It was assumed that some of the usage was processed at a time when the usage guide(s) would have directed the usage to our error process. , There is no way to specifically determine the root cause of discrepancy without being able to trace this usage back through the processed error usage. BellSouth recommends that the UNE billing rate elements be verified during any subsequent UNE re-test.

Operator Call Handling

BellSouth determined that the rate file system authorizes Operator Call Handling(OPCH) with a LIDB dip to be rated in one of two ways. . A CLEC contract can contain a) two separate rates; one for the OPCH portion and one for the LIDB portion; or b) a combined rate for both the OPCH and the LIDB. The KPMG billing was set up for the combined rate. The design for the rate file maintenance process requires BellSouth to enter rates for both the rate structure that has two separate rates, and the rate structure that has the combined rate. When a CLEC contract contains the two-rate structure, BellSouth enters the appropriate rate in the OPCH rate field and the appropriate rate in the LIDB rate field, and a rate of zero in the combined rate field. When a CLEC contract contains the

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 91

combined rate structure, the appropriate rate is entered in the combined rate field, and a zero rate is entered in both the OPCH rate field and the LIDB rate field.

There is a design flaw in the rating process that will look for the two-rate structure as the first step in the process. If there are entries for the two-rate structure, then those rates are applied for billing purposes. If the entries for the two-rate structure are not found, then the process will look for the combined rate structure. The problem with this design is that both rate structure entries are required, and as a result, when a CLEC has a combined rate structure, the two rate structure will always be found with zero rate entries.

The programming staff has recommended the following work around: For a CLEC that has a combined rate structure, the two rate structure entries can be entered with a zero rate, and the effective dates and end dates can be entered such that both date ranges will fall prior to the effective date of the contract. This will in effect make these rate entries invalid for use, and the system will then bypass them and use the combined rate structure.

There are two options for a long term fix: a) change the rate file maintenance process such that both rate structures are not required, or b) change the rate file maintenance process such that zero rates are not required and a given rate structure can be shown as not/applicable. Either option will require an enhancement to the system which will have to be scheduled and worked into the IT work request process. BellSouth will investigate the appropriate option for correcting this process, issue a work request, and coordinate to determine an implementation date.

Automated Call Handling

The rate element is processed in the same way as stated above. It is the two-rate structure vs. the combined rate structure.

For the subsequent re-test of the UNE Invoice:

BellSouth was able to show that the manual work-around process for the rate file system for Operator Call Handling and Automated Call Handling resulted in accurate billing for these rate elements.

For the two rate elements that were still in question from the initial UNE Invoice Test (Verification and Interrupt): BellSouth was able to show accurate billing for these rate elements as well. These two rate elements have a rate structure that calls for billing on a per minute basis, for operator work time, and records show that the duration(s) for these calls match the billing shown on the May Invoices. BellSouth recognizes that Operator Work time is not populated on the ODUF records that represent these calls, since that is an optional field and is populated at the provider's discretion. BellSouth recognizes the shortfall of the EMI standards in this area and has submitted a work request to begin populating this field. The target date for implementation is 4Q00.

**BELLSOUTH'S SECOND AMENDED RESPONSE TO
EXCEPTION 91**

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 100



August 17, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Performance Measurement testing associated with the validation of service quality measurement (SQM) calculations.

Exception:

KPMG was unable to replicate two of BellSouth's Service Quality Measurements (SQMs) in the May 2000 report.

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. Additionally, BellSouth publishes the monthly raw data used to create these reports¹.

As part of the BellSouth-Georgia OSS Evaluation, KPMG is attempting to replicate these reports (i.e., achieve exactly the same results as reported by BellSouth). To complete validation of the calculations, KPMG has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, and the corresponding raw data,² along with technical assistance from BellSouth when necessary.

KPMG experienced replication problems for the following SQMs in the May 2000 report.

1. ***Coordinated Customer Conversions in the Provisioning category for the KPMG Test CLEC.*** KPMG was unable to replicate Average Interval values in the SQM report, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
Unbundled Loops Without Number Portability; Avg Interval(Min)	4.75	4
Total; Avg Interval(Min)	4.75	4

¹ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) Web site.

² The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the Manual and corresponding raw data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The manual is posted and updated on the PMAP site.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 100

2. **Invoice Accuracy in the Billing category for the KPMG Test CLEC.** KPMG was unable to replicate the UNE product group in the SQM report, using BellSouth instructions. The discrepancies are detailed in the following table.

Category	KPMG Calculation	BellSouth Report
UNE; Total Billed Revenue	\$29,145.87	\$29,039.40
UNE; Total Adjustments	\$42,291.62	\$44,828.80
UNE; Percent Accuracy	-45.103%	-54.372%

Additionally, KPMG discovered that five cells in the "ADJUSTMENT" field in the May raw data contained commas, after the adjustment amount. Since these fields are non-numeric, they are not included in the calculation of the *Invoice Accuracy* metric.

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. KPMG's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the two applicable SQMs may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

BellSouth Response

Coordinated Customer Conversions in the Provisioning category for the KPMG Test CLEC.

Effective with the July SQM report, the CCC report is now reporting the "Average Interval" in minutes and seconds (4:45). Previously this was reported in minutes and hundredths of minutes (4.75). Prior to May 2000, the file that was used to generate the CCC report was created manually. Seconds were not included because they were not available. Now, beginning in May 2000, the file is created mechanically and seconds are available. A software change was made due to this new time format (yyyy-mm-dd hh:mm:ss). The first time the report was run the report had the seconds truncated. The report has now been rerun and the "Average Interval" is now reported in minutes and seconds.

A problem was discovered on the May CCC report resulting in incorrect data for the Total Minutes and Average Interval fields for ZXC. The correct data is 19:56 and 4:59 minutes respectively. This problem is due to a problem in the program to calculate this data. The seconds were not being included when calculating the Total Minutes. This problem is being corrected.

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 100

The CCC program has been corrected to include the "seconds" in the computations and has been rerun. Since this is a May report it will not be re-posted on the WEB. A copy of the report for the ZXC test CLEC was sent to KPMG on 8/17/00.

Currently the CCC report is a manual report. Development work is in progress to mechanize this report in PMAP using a data feed from Barney. It is anticipated that the August report (report created in September using August data) will be mechanized. When this is completed, the report and the raw data will be available from the PMAP website.

Invoice Accuracy in the Billing category for the KPMG Test CLEC

(1) The five cells in the "ADJUSTMENT" field in the May raw data (which contained commas) should be included in the adjustment amount totals. The original values appeared with a comma following the value. This error occurred when converting the manual file into EXCEL. BellSouth will review the manual files in the future prior to submitting the final report to PMAP to avoid this problem.

If KPMG includes the corrected values in their calculations, their results should be the same as the total adjustments that the Billing E&Y file reflected. The five cell values are listed below:

UNE	Orig. ADJ value	Corrected ADJ value	Revenue	Name	BAN
UNE	785.001,	785.00	70.00	KPMG 271 TESTING	706 Q59-4610
UNE	1,023.921,	1,023.92	91.66	KPMG 271 TESTING	706 Q85-5625
UNE	876.091,	876.09	70.00	KPMG 271 TESTING	770 Q85-5625
UNE	1,030.036,	1,030.03	14.81	KPMG 271 TESTING	770 Q85-8252
UNE	876.091,	876.09	70.00	KPMG 271 TESTING	770 Q85-8415

(2) The BellSouth Reported calculations on the Draft Exception 124 for UNE Total Billed Revenue & Total Adjustments were the values that were in PMAP (and not the E&YMAY2000 totals).

(3) Based on BellSouth's investigation, it appears that PMAP excluded the following two records:

OCN	Month	State	Type	Adjustment	Revenue	Name	Billing Number
9990	May-00	GA	UNE	1023.92	91.66	KPMG 271 Testing	706 Q85-5625
9990	May-00	GA	UNE	1030.03	14.81	KPMG 271 Testing	770 Q85-8252

BELLSOUTH'S SECOND AMENDED RESPONSE TO EXCEPTION 100

TOTALS	2053.95	106.47		
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The two records with commas in the adjustment column were excluded from the PMAP calculations. When processing, PMAP searches for commas in the "Company Name" column, then replaces commas with a space. This command resulted in invalid numbers for those cells with numbers less than \$1,000.00. For values greater than \$1,000.00 both columns were replaced with a space. Data stage was able to process those cells with values less than 1,000, but not able to process the two records with values greater than 1,000.

The net result was that PMAP's adjustment difference of \$2053.95 was the sum of what should have been \$1023.92 and \$1030.03. In the future, the pre-run check will include formatting the number columns as "Number". This will ensure that the "find/replace command will not affect the results."

- (4) The difference between the PMAP reported values for UNE (KPMG CLEC), KPMG calculated values and E&Y reported values for UNE (KPMG CLEC) is as follows:

Calculation Source	TYPE	Total Billed Revenue	Total Adjustments
E&YMayFile	UNE	29145.87	46882.75
KPMG	UNE	29145.87	42291.62
Difference (5 records w/ commas)			4591.13
PMAP	UNE	29039.40	44828.80
Difference PMAP & E&Y file		106.47	2053.95

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 27



August 18, 2000

EXCEPTION REPORT

The following exception has been identified as a result of the ADUF/ODUF Functional Usage Evaluation (BLG-2)

Exception:

BellSouth provided incorrect DUF records to KPMG.

During the period of November 18-20, 1999 KPMG completed 846 test calls (for which DUF files were expected) for the ADUF/ODUF Functional Usage Evaluation¹. As part of the evaluation, BellSouth provided DUF records for these calls. Through evaluation of these DUF records, KPMG has determined that BellSouth provided incorrect DUF records for certain test calls. Incorrect DUF records are categorized here as: 1) Misidentified DUF records; 2) Improper DUF records.

Misidentified DUF Records

KPMG received numerous ODUF records inappropriately identifying toll calls as local calls. EMI industry standards dictate that the Record Identifier 100101 is to be used to identify toll call detail transmitted from the recording entity to the rating entity. BellSouth failed to adhere to the EMI standard. Representative occurrences of errors are detailed below.

Misidentified Toll Calls

Date	Cat.	From Number	To Number	Connect Time
Nov 20	100131	770-933-8170	706-236-9787	09:44
Nov 20	100131	770-933-8526	706-236-9677	10:02
Nov 20	100131	770-933-8170	706-236-9787	13:56
Nov 20	100131	770-933-8526	706-236-9677	08:59
Nov 20	100131	706-236-9677	770-933-8170	09:42
Nov 20	100131	706-236-9787	770-933-8170	13:58
Nov 20	100131	706-236-9677	770-933-8876	10:24
Nov 20	100131	706-236-9677	770-933-8876	14:07
Nov 19	100131	706-236-9677	770-933-8170	11:47
Nov 19	100131	706-236-9677	770-933-8523	15:29

¹ Access Daily Usage Files (ADUF) provide competitive local exchange carriers with records of intraLATA/interLATA calls originated from or terminated to CLEC end user lines. Optional Daily Usage Files (ODUF) provide competitive local exchange carriers with records of billable measured intraLATA local and toll calls, per use/per activation services, directory assistance messages and WATS & 800 service calls.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 27

Improper DUF Records

BLS submitted DUFs for zero-minus² calls placed by testers requesting operator assistance in placing inter-LATA calls. DUF records indicate that local BellSouth operators attempted to place these inter-LATA calls. Inter-LATA calls cannot be completed by local operators therefore no attempt should have been made to place the calls and no DUF record should have been created.

The EMI standard contains no provisions for inappropriately attempted calls. BellSouth previously stated its DUF production process conforms to the EMI standard, noting no exceptions. Details of improper DUFs are shown below.

Improper DUF Records

Date	Cat.	From Number	To Number	Connect Time
Nov 19	100101	706-722-2879	912-741-7059	15:18
Nov 19	100101	706-236-9492	706-722-2879	11:31

Impact

Incorrect DUF records impact CLECs in the following ways:

- **Decrease in revenue.** A CLEC receiving incorrect ODUF information will not be able to bill end-user customers correctly for local and toll calls. Likewise, the absence of correct ADUF information will prevent CLEC from billing an inter-exchange carrier correctly. As a result, the CLEC will lose revenue.
- **Decrease in customer satisfaction.** Providing a CLEC with incorrect DUF records will cause the CLEC to incorrectly bill a customer for usage. This will likely result in a decrease in end-user satisfaction.
- **Increase in operating costs.** Inappropriate charges for operator services may be billed to a CLEC as a result of the creation of inappropriate DUF records. A CLEC receiving improper DUF records will be forced to engage in a protracted reconciliation of billing information. This will result in an increase in labor costs. In addition,

BellSouth Response

Misidentified Toll Calls

BellSouth has issued a policy for UNE Local /Toll determination. A work request has been issued to make changes to our systems to match this policy. This policy will be

² Zero-minus calls are those placed by dialing zero for operator assistance.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 27

updated in the ODUF documentation provided to CLECs. The official ODUF policy is listed below.

BellSouth Optional Daily Usage File (ODUF)

ODUF Policy: Local Traffic

Service Description

BellSouth Optional Daily Usage File (ODUF) is a service provided to Competitive Local Exchange Carriers (CLECs) that provides electronic billing data for billable messages that: (1) are carried over the BellSouth network; (2) are processed in the BellSouth CRIS billing system; and (3) are billed to the CLEC. ODUF provides subscribing CLECs their end users' calling data on a daily basis. This information can be used for billing, for developing targeted service offerings based on end user calling packages, and provides timely data to assist in preventing fraud.

Reason for Clarification of ODUF Policy

The definition of Local UNE Traffic has been modified to the following: all intraLATA calls placed by UNE CLEC end users that are carried over the BellSouth network are considered local calls. This change necessitates a clarification of ODUF policy.

ODUF Policy

Currently, BST has not clearly defined which records are sent via ODUF to subscribing CLECs as local and which are sent as toll. BellSouth policy will be clarified to state the following:

Records sent to UNE CLECs that subscribe to ODUF will reflect call types as recorded by the originating switch. Calls that are recorded by the switch as Local, that remain within the originating LATA, and are carried over the BellSouth network will be sent on ODUF as local records. Calls that are recorded by the originating switch as toll, that remain within the LATA, and are carried on the BellSouth network will be sent on ODUF as toll records.

NOTE: Operator handled records record as toll, and will be sent on ODUF as toll records.

Benefits of Policy Change:

- ODUF records would match BellSouth switch recordings
- Minimal changes to the current billing systems will be required to implement this policy

Implementation of Policy Change:

- The formal CLEC notification process will also need to be utilized to inform CLECs of this policy.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 27

- Changes to the language in the Standard Interconnection Agreement will be required to match this policy. It should be clearly stated that ODUF records will reflect the dialing patterns of the UNE end users. The Standard Agreement should also state that ODUF should not be used for billing reconciliation. This policy has been in place for several years and is outlined in the ODUF documentation posted on the web site. The Optional Daily Usage File (ODUF) is intended to provide CLECs with potentially billable messages billing to a CLECs' end users. ODUF was not designed for use by the CLECs in reconciling their CLEC bill from BellSouth. Some reasons that ODUF should not be used for the CLECs' bill reconciliation include:
- Directory Assistance (DA) has allowances in most BellSouth states. This is where the customer may make multiple DA calls in a month, but due to the allowance is only billed for the amount of DA calls less the allowance. ODUF sends the CLEC all DA calls an end user makes. Therefore, the CLEC will find a discrepancy between ODUF and the CLEC Bill from BellSouth.
- Local Messages are sent on the ODUF file to the CLEC when the end user has a calling plan that is usage sensitive/measured. All messages for usage sensitive/measured CLEC end users are sent to the CLEC. Depending on the local plan, messages can be dropped from billing due to allowances in the plan. Therefore, the CLEC will find a discrepancy between ODUF and the CLEC Bill from BellSouth.
- The ODUF files are sent to the CLECs daily Monday through Friday except on holidays. The BellSouth CLEC Bill can be pulled on different workdays of the month depending on holidays, weekends, etc. This can cause message day cutoffs to vary month to month, therefore causing discrepancies in reconciling ODUF to the CLEC Bill from BellSouth.

ODUF documentation will be updated and posted on the web 4th quarter 2000 to reflect the change shown in red.

Improper DUF Records

The call detail records for the above two calls reflect that the calls originated from a UNE Switch Port, and terminated to a BellSouth Operator because both calls were Zero-Minus (0-) dialed. Both of the calls were not completed to the called party and as such the EMI records were marked as an Attempt Message with Indicator 18 to 2 in the 10-01-01 records. The DUF Records include all Attempt/Incomplete calls that are handled by an operator using a Category 10 EMI record, and not the 11-01-01 EMI record. The purpose of these records is to notify the CLEC that their customer of record used BellSouth Operator Services, and the CLEC will be billed an Operator surcharge on their UNE bill. The use of a Category 10 EMI record is consistent with the EMI guidelines with respect to operator calls. The practice is covered in the training provided to CLECs on the ODUF feed

In an attempt to clarify this treatment further, a notation was added to the BellSouth Optional Daily Usage File document, Attachment B ODUF EMI Call Detail Records.

BELLSOUTH'S FOURTH AMENDED RESPONSE TO EXCEPTION 27

In addition, the Interconnection Contracts signed by CLECs describe the charges that will be billed for Operator Handled calls. It is BellSouth's position that the contract language along with the rate sheets for these services provide the authorization for BellSouth to bill operator surcharges for incomplete calls, regardless of the reason the call did not complete.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 16



August 8, 2000

EXCEPTION REPORT

The following exception has been identified as a result of the CRIS/CABS Functional Test (BLG-1).

Exception:

BellSouth issued multiple bills containing erroneous information to the KPMG CLEC.

As a result of billing transaction tests, BellSouth issued bills associated with a variety of service activities to the KPMG CLEC. Multiple bills received by the KPMG CLEC contain erroneous information, such as: 1) Undocumented charges; 2) Incorrect Rates; 3) Misabeled information.

Undocumented Charges

USOC VE1R2: During the months of October 1999 through December 1999, BellSouth billed the KPMG CLEC \$0.25 each month for a UNE service component identified by the Universal Service Order Code (USOC) VE1R2 (Virtual Expanded Interconnection). USOC VE1R2 is not defined in applicable BellSouth tariffs or in rate spreadsheets created for the KPMG CLEC in lieu of an Interconnection Agreement.

Upon inquiry, BellSouth informed KPMG that the USOC VE1R2 was added to the BellSouth rate tables in 1997 and is applicable to all CLECs. The monthly-recurring rate established for this USOC is \$0.30. BellSouth applied a business discount of 17.3%, resulting in a monthly-recurring charge of \$0.25.

Representative occurrences of this charge are found on the following invoices:

<u>Telephone Number</u>	<u>Account Number</u>	<u>Invoice Date</u>
912-744-0966	706 Q97 9808 808	12/17/99
912-744-2438	706 Q97 9808 808	12/17/99
706-722-4087	706 Q85 8252 252	10/5/99
706-722-4181	706 Q85 8252 252	10/5/99
706-722-5472	706 Q85 8252 252	10/5/99
706-722-8138	706 Q85 8252 252	12/5/99
706-722-9523	706 Q85 8252 252	12/5/99
770-933-8597	770 Q85 8252 252	10/5/99
770-933-9532	770 Q85 8252 252	10/5/99
706-722-8138	706 Q85 8252 252	11/5/99
706-722-9523	706 Q85 8252 252	11/5/99

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 16

USOC SOMEK: The USOC SOMEK (a charge assessed for mechanized CLEC service order requests) was incorrectly applied for non-CABS orders. The existence of this USOC and its associated monthly charge is not documented in the BellSouth tariffs. The rate spreadsheet created for the KPMG CLEC in lieu of an Interconnection Agreement lists the charge for the USOC SOMEK as a one-time charge of \$5.00 for CABS orders; no such charge appears for non-CABS orders.

Representative occurrences of errors are detailed on the following invoices:

<u>Q-Account</u>	<u>Earning TN</u>	<u>Invoice Date</u>
706 Q85-4226 226	912U480010	10/17/99
706 Q85-4226 226	706U579269	10/17/99

USOC UEAC2¹: BellSouth billed the KPMG CLEC for the monthly recurring charge and non-recurring charge for the USOC UEAC2 (2-Wire Cross-Connect for Provisioning) at a rate of \$0.00. The non-recurring and monthly recurring rate assessed by BellSouth for the USOC UEAC2 for SL1 loops is not listed in the rate spreadsheets created for the KPMG CLEC in lieu of an Interconnection Agreement. In addition, this USOC is not defined in applicable BellSouth tariffs.

Representative occurrences of this charge can be found on the following invoices:

<u>Q-Account</u>	<u>Circuit ID</u>	<u>Invoice Date</u>
706 Q85-4226 226	40.TYNU.526413	10/17/99
706 Q85-4226 226	40.TYNU.526414	10/17/99

Incorrect Rates

USOC UEAL2²: BellSouth billed the KPMG CLEC a \$0.00 monthly recurring charge for the USOC UEAL2. The USOC UEAL2 is listed in the rate spreadsheet as a monthly recurring charge of \$19.57 for SL2 Loops and \$16.51 for SL1 Loops. This USOC is not defined in applicable BellSouth tariffs.

Representative occurrences of this error are detailed below.

<u>Q-Account</u>	<u>Circuit ID</u>	<u>Invoice Date</u>
706 Q85-4226 226	50.TYNU.500910	10/17/99
706 Q85-4226 226	50.TYNU.500911	10/17/99
706 Q85-4226 226	50.TYNU.501081	01/17/00
706 Q85-4226 226	50.TYNU.500896	01/17/00

¹ These errors had no net monetary effect on the KPMG CLEC bills.

² These errors resulted in an under-charge to the KPMG CLEC.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 16

Mislabeled Information

Mislabeled in Detail of Adjustments Applied: The KPMG CLEC submitted several Billing Adjustment Investigation Requests to BellSouth. KPMG requested adjustments of \$17.16 for USOC UEPBL and for \$12.60 for USOC VE1R2. A third adjustment was requested for \$125.00 for an overpayment on the account. These adjustment requests were processed and the credits were applied on the 12/17/99 invoice of Billing Account Number 770-Q97-9808-808. The three adjustments requested were aggregated and labeled as "Credit for Service Disconnected." Although BellSouth documentation does not address specifics regarding adjustment details, aggregating adjustments denies a CLEC the ability to validate specific adjustments credited against those requested.

Impact

Issuing bills containing erroneous information will have the following effect on CLECs:

- **Altering expected operating costs.** All applicable charges should appear in Interconnection Agreements or in BellSouth Intra-State or Inter-State tariff documentation. By not adhering to rate documentation, BellSouth alters a CLEC's expected operating costs, and could affect CLEC budgetary planning and related activities.
- **Increased resource usage.** Regardless of the net monetary effect of incorrect charges upon a CLEC's bills, a CLEC will be forced to regularly reconcile these bills – identifying and correcting the incorrect charges and discovering and disaggregating mislabeled charges. The necessity of an extensive validation of each bill will increase CLEC resource utilization, thereby increasing operating costs.

BellSouth Response

Undocumented Charges – USOC VE1R2

The standard interconnection agreements refer to the parties to the applicable tariffs in cases where specific rates are not provided in the agreement. For Virtual Collocation, the tariff is the F.C.C. Tariff No. 1. However, no service comparable to a DS0 cross-connect is described in the F.C.C. Tariff No. 1. To resolve this gap, rates for this specific USOC were developed by the Virtual Interconnection Product Team. A recurring rate of \$0.30 per month was established for use when this service was ordered by and provisioned for a customer. The USOC, VE1R2, was added into the applicable rating tables in advance of an approved tariff and was incorrectly set to apply the resale discount.

BellSouth has plans to add the USOC VE1R2 to the standard agreement. This should be completed by 4Q00. BellSouth did investigate and determine that no CLECs, other than the third party test CLEC, has ever been billed for this USOC.

Undocumented Charges – USOC SOME C

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An Interconnection Agreement was not signed with the initial Test Manager. Rates for USOCs for individual services were updated to the appropriate billing tables only for those services expected to be ordered during the test. A mistake was made which caused a mismatch between CRIS and CABS for the USOC SOMEK. If a standard interconnection agreement been used as the authorization for the services ordered by the test manager, the contract implementation processes would have caused the appropriate rate to be loaded for this USOC in both CRIS and CABS.

A new edit will be implemented in October, 2000 which will error any UNE service order processed in CRIS for which a customer specific rate entry has not been added to the billing rate tables. This additional control will insure that all appropriate USOCs have been added for each CLEC prior to a service order being completed. This edit currently exists in CABS and, therefore, no corrective action is required for service orders processed through that system.

An interim process was developed to insure accurate USOC rating will occur until the permanent edit solution is implemented. A new report was created and will be implemented on 7/17/00 which is to be reviewed each day for CRIS service orders processed using USOC rates not specifically loaded for the CLEC. The report will be analyzed to determine if the CLEC is ordering services either not covered in the agreement (which then will be discussed with the CLEC) or services for which rate table entries were inadvertently omitted.

Undocumented Charges – USOC UEAC2

An Interconnection Agreement was not signed with the initial Test Manager. Rates for USOCs for individual services were updated to the appropriate billing tables only for those expected to be ordered during the test. For USOC UEAC2 a mistake was made in that USOCs for cross connects were not included in the rate tables. If a standard interconnection agreement been used as the authorization for the services ordered by the test manager, the contract implementation processes would have caused the appropriate rate to be loaded for this USOC.

A new edit will be implemented in October, 2000 which will error any UNE service order processed in CRIS for which a customer specific rate entry has not been added to the billing rate table. This additional control will insure that all appropriate USOCs have been added for each CLEC prior to a service order being completed. This edit currently exists in CABS and, therefore, no corrective action is required for service orders processed through that system.

Incorrect Rates – USOC UEAL2

Due to an error in loading the rate tables the USOC, UEAL2, was updated to the CRIS rate tables only for residence classes of service. The accounts which contain these USOCs are defined as business accounts. As such, the rate defaulted to zero. The USOC was added to the CRIS rate file for business classes of service on 3/1/00. This will

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 16

correct the rates on a going forward basis. BellSouth plans to have all occurrences of the USOC on CLEC accounts revised to reflect this charge by 3/17/00.

Mislabeled Information

The requested adjustments were labeled as credits for disconnected service due to an error in mapping these types of transactions to the OBF "J" bill phrases. The labels were changed to match the phrases used for processing adjustments for retail customers on 04/19/00.

The aggregation of adjustments seen on the "J" bills is identical to the manner in which these types of transactions are aggregated in the billing systems for retail customers. As such, BellSouth is providing parity of service to its retail and resale customers.

The three adjustments requested by KPMG were entered as a combined adjustment; i.e. the LCSC representative added the three amounts together and entered one adjustment "voucher" due to a misunderstanding by the Billing Manager. However, individual adjustments are normally processed unless the CLEC requests an aggregated adjustment.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 52



August 11, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Metrics Calculation and Reporting Verification and Validation Review (PMR-5).

Exception:

KPMG cannot replicate twelve of BellSouth's reported Service Quality Measurements (SQMs).

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports¹.

As part of the BellSouth-Georgia OSS Evaluation, KPMG is attempting to replicate these reports (i.e., achieve exactly the same results as reported by BellSouth). For this purpose, KPMG has relied on BellSouth's published *PMAP Raw Data User Manual*, where applicable, and the corresponding raw data,² along with technical assistance from BellSouth.

KPMG has been unable to replicate report values for the following SQMs for the month of October 1999³:

1. **Coordinated Customer Conversions in the Provisioning category for the CLEC Aggregate.** KPMG was unable to replicate the following values in the BellSouth SQM report:

Category	KPMG Calculations	BellSouth's Report
Without Number Portability; Count <=5	1888	1880
Without Number Portability;	81.48 %	81.14 %

¹ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) Web site.

² The *PMAP Raw Data User Manual* includes instructions to calculate SQM values for certain reports. BellSouth publishes the *PMAP Raw Data User Manual* and the corresponding raw data to provide to CLECs the ability to calculate their SQM values independently and thus verify the reports. The *PMAP Raw Data User Manual* is posted and updated on the PMAP site.

³ BellSouth provided KPMG with the raw data and technical instructions necessary to validate the calculations, since the raw data and technical instruction was not available via the PMAP site.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 52

% <=5		
Without Number Portability; Count >15	114	122
Without Number Portability; % >15	4.92 %	5.27 %
Without Number Portability; Total Minutes	9369	9969
Without Number Portability; Average Interval (Min)	4.0	4.3

2. **Timeliness in the E911 category for the combined CLEC Aggregate and BellSouth Retail.** KPMG was unable to replicate the following values in the BellSouth SQM report:

Category	KPMG Calculations	BellSouth's Report
Percent answered 0-4 hours	82.94%	82.45%
Percent answered 4-8 hours	1.41%	3.08%
Percent answered 8-12 hours	2.53%	4.10%
Percent answered 12-16 hours	3.13%	1.27%
Percent answered 16-20 hours	2.44%	4.28%
Percent answered 20-24 hours	2.87%	1.33%
Percent answered 24+ hours	4.69%	3.50%

3. **Mean Interval in the E911 category for the combined CLEC Aggregate and BellSouth Retail.** KPMG was unable to replicate the Mean Interval Duration in the BellSouth SQM report:

Category	KPMG Calculations	BellSouth's Report
Mean Interval Duration	0.03	3.81

4. **Percent Rejected Service Requests in the Ordering category for the CLEC Aggregate.** KPMG was unable to replicate the BellSouth-reported SQM values for the Non-Mechanized report, using BellSouth's instructions.

Category	KPMG Calculations	BellSouth's Report
Product = Special; Product Specific % Rejected	0.331	0.329
Product = Special; Product Specific % Rejected	0.144	0.142

5. **Reject Interval in the Ordering category for the CLEC Aggregate.**
For several reports (*Partially Mechanized, Total Mechanized, and Non-Mechanized*), KPMG was unable to replicate the BellSouth reported SQM values, using BellSouth's instructions.

6. **FOC Timeliness in the Ordering category for the CLEC Aggregate.**

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 52

For each report (*Fully Mechanized, Partially Mechanized, Total Mechanized, and Non-Mechanized*), KPMG was unable to replicate the BellSouth reported SQM values, using BellSouth's instructions.

7. **Mean Held Order Interval and Distributions Interval in the Provisioning non-trunks category for the CLEC Aggregate and BellSouth Retail, and the Provisioning trunks category for the CLEC Aggregate.** KPMG was unable to replicate the BellSouth reported SQM values, using BellSouth's instructions.
8. **Usage Data Delivery Completeness in the Billing category for the CLEC Aggregate and BellSouth Retail.** KPMG was unable to replicate the BellSouth reported "Day >30 Cumulative % Completeness Benchmark" value. BellSouth reports a rounded value of 1, although there are usage data records delivered after 30 days.

Category	KPMG Calculations	BellSouth's Report
Day >30 Cumulative % Completeness Benchmark (CLEC Aggregate)	0.9974825	1
Day >30 Cumulative % Completeness Benchmark (BellSouth Retail)	0.9978706	1

9. **Mean Time to Deliver Usage in the Billing category for the CLEC Aggregate and BellSouth Retail.** BellSouth weighted the record volume by adding 1.5 to the "Days Delayed," rather than the 0.5 indicated in their written instructions. Thus, the BellSouth calculated value is greater than the KPMG-calculated value by 1.

Category	KPMG Calculations	BellSouth's Report
Mean Time (CLEC Aggregate)	3.64	4.64
Mean Time (BellSouth Retail)	2.42	3.42

10. **Usage Data Delivery Accuracy in the Billing category for the CLEC Aggregate.** KPMG was unable to replicate the BellSouth reported "Total Data Packs Sent" value.

Category	KPMG Calculations	BellSouth's Report
Total Data Packs Sent	5012	5024

11. **Invoice Accuracy in the Billing category for the CLEC Aggregate.** KPMG was unable to replicate any of the BellSouth reported SQM values.
12. **Mean Time to Deliver Invoices in the Billing category for the CLEC Aggregate.**

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 52

KPMG was unable to replicate the BellSouth reported "Mean Time to Deliver CABS Bills" value for the Interconnection type of service.

Category	KPMG Calculations	BellSouth's Report
Mean Time to Deliver CABS Bills -cal day; Interconnection	5.74	5.66

Impact

CLECs rely on BellSouth's performance measurement reports to assess the quality of service provided by BellSouth and to plan future business activities. KPMG's inability to replicate report values signifies that the accuracy of BellSouth's calculations for the twelve applicable SQMs may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

BellSouth Response

Coordinated Customer Conversions in the Provisioning category for the CLEC Aggregate.

The reason for the difference between the BellSouth report values and the KPMG report values is because of different calculation methods.

BellSouth calculation for the "avg." cut minutes per item is derived using the following:

$$\text{avg. (cut time per item)} = (\text{cut comp} - \text{cut start}) / \# \text{ items}$$

KPMG derived this by using the following:

$$\text{avg. (cut time per item)} = \text{cut min} / \# \text{ items}$$

The file that was used for generating the PMAP report for October 1999 contained manually calculated cut minutes. There were some errors in these calculations but the errors were of no consequence because the cut minutes were not used by the formula to calculate the CCC report. (There is a BellSouth group that uses cut minutes data for other reports.) These miscalculations in the cut minutes were discovered and beginning in November 1999 the cut minutes were calculated mechanically. The formula for calculating the cut minutes was applied to the October file which was inadvertently sent to KPMG instead of the original raw data file that was sent to the PMAP databases used calculating the CCC report. Also, when the cut complete and cut start times are the same the cut minutes are defaulted to 1 (one) minute when preparing the raw data file. When the PMAP databases calculate the cut minutes, the actual value is used in these cases instead of a default value. Both files used by KPMG and the original raw data file for October is available for re-testing as required.

Timeliness in the E911 category for the combined CLEC Aggregate and BellSouth Retail.

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The values found in the October SQM are correct. The instructions provided to KPMG lacked the specificity to permit KPMG to replicate the data. BellSouth has revised the instructions to be more specific and corrected one calculation. As a result, KPMG was able to replicate the Timeliness values in the E911 category for the October 1999.

Mean Interval in the E911 category for the combined CLEC Aggregate and BellSouth Retail.

KPMG should follow the revised method included in Item No. 3 of BellSouth's instructions. By doing so, KPMG should be able to replicate the Mean Interval Duration found in BellSouth's October 1999 report.

Updated instructions were sent to KPMG for review in calculation of data. As of 5/02/00 KPMG advised BellSouth that they were unable to replicate the October 1999 E911 Mean Interval of 3.81. KPMG's derived number was 3.819. BellSouth's Application Developer revised the narrative of PMAP's E911 Duration Calculation Procedure and sent this to KPMG on 5/9/00. KPMG reported on 5/10/00 that they were able to replicate the BellSouth reported value for Mean Interval Duration for this SQM.

BellSouth has updated its instructions available to CLECs to reflect the information provided to KPMG. BellSouth does not provide Raw Data to the CLECs for *Mean Interval in the E911* categories and does not provide instructions to the CLECs.

Percent Rejected Service Requests in the Ordering category for the CLEC Aggregate.

BellSouth agrees with KPMG that they were unable to replicate the BellSouth reported SQM values for *Percent Rejected Service Request* for the Non-Mechanized report for the CLEC Aggregate for October 1999.

BellSouth discovered that there were reject count errors in the October raw data. PMAP coding changes implemented in November affecting LSRs received will not allow BellSouth to replicate the exclusions for October data. The February version of the Raw Data Users Manual will allow KPMG to replicate data from December 1999 through March 2000.

The following changes are important if KPMG desires to review additional months for data validation for this metric. A PMAP coding change request (Issue Tracker # 5705) implemented in April 2000 modified the SQM report to exclude LSRs cancelled prior to being rejected. The Raw Data Users Manual is being updated to reflect this information. A PMAP coding change request (Issue Tracker # 5542) has been issued to modify PMAP reports to reflect the new LCSC hours of operation. This coding change is scheduled to be implemented for May data in June 2000. Again, the Raw Data Users Manual will be updated to reflect this information.

Reject Interval in the Ordering category for the CLEC Aggregate.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 52

The values found in the October 1999 SQM are correct. Using the February version of the Raw Data Users Manual, KPMG was able to replicate the reported SQM values. BellSouth provided KPMG with sample queries and as a result, KPMG was able to replicate the *Reject Interval* for the CLEC Aggregate data for October 1999.

FOC Timeliness in the Ordering category for the CLEC Aggregate.

BellSouth agrees that KPMG was unable to replicate the BellSouth reported SQM for *FOC Timeliness* for the CLEC Aggregate for October 1999. Upon further investigation, BellSouth identified a problem in the interval "buckets". The difference between KPMG's numbers and PMAP's numbers can be attributed to the LSRs FOC'd (orders confirmed) in the 15th minute. KPMG was putting those LSRs in the 15-30 minute "bucket" while PMAP was including them in the 0-15 minute "bucket".

As a result of this KPMG draft exception, System Change Request 5848 was opened to clarify the bucket definitions and is scheduled to be effective for May data that will be published in June. The Raw Data Users Manual was updated in May, reflecting these changes.

The *FOC Timeliness* for the May report had to be rerun because prior to May, two pieces of code were designed to exclude non-mechanized LSRs, which were received and/or processed on weekends. Although the first piece of code was correctly rewritten to exclude appropriate weekend hours, the second was overlooked and LSRs received and/or processed on weekends continued to be excluded. The code was corrected and the report was rerun on July 27. Notification that May Ordering Reports had been rerun was posted to the Web on August 1, 2000. The July SQM further clarified the issue regarding the appropriate bucket for 15 minute FOCs.

BellSouth has provided KPMG with *FOC Timeliness* data for May and June 2000 for retesting.

Mean Held Order Interval and Distributions Interval in the Provisioning non-trunks category for the CLEC Aggregate and BellSouth Retail, and the Provisioning trunks category for the CLEC Aggregate.

The instructions in the Raw Data User Manual were corrected in the 2.0.7 version dated 07/26/00, with multiple changes to further clarify the instructions for *Mean Held Order Interval*. This is an update to previous instructions provided to KPMG. Also, prior to December 1999, a section of the Ardent DataStage code that is used to create Held Order and Held Order Trunking reports was incorrect. This was explained in the initial set of instructions. A correction was made to the code that changed the assignment of the synthetic key by ordering the loading of the table by CMTT_DATE ascending. This change made the minimum CMTT_DATE correspond to the minimum SO_CMTT HIST_ID and so forth so that the final and first commitments selected would

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 52

be the final and first CMTT_DATE. Due to the nature of this error, the October 1999 Held Order and Held Order Trunking raw data cannot be used to replicate the end report.

A change request (CR 6070) was entered into issue tracker to make a correction to the Ardent code to exclude orders in 'CP', PC, CA status and to only include orders where CMPLTN_DT is null. This will be effective with the July data for August 15th reports. Ardent DataStage code was corrected as stated above in CR 6070. KPMG should use July data to replicate *Mean Held Order Interval and Distributions Interval*.

Usage Data Delivery Completeness in the Billing category for the CLEC Aggregate and BellSouth Retail.

The PMAP reports for BellSouth 'Day >30 Cumulative % Completeness Benchmark (CLEC Aggregate) & Day >30 Cumulative % Completeness Benchmark (BellSouth Retail)' show the same results for OCT 1999 as KPMG. There was a programming problem that was corrected in PMAP, Issue Tracker #5584 on Feb 18, 2000. This report has been re-run, verified to match, and resent to KPMG on 6/5/00. The file used by KPMG is available for retesting as required.

Mean Time to Deliver Usage in the Billing category for the CLEC Aggregate and BellSouth Retail.

There was a programming problem in PMAP that has been corrected. The BellSouth team has researched these issues and they are now corrected as of 2/2/00. The weighting that is currently applied to this measure in an Excel spreadsheet is used by an Ardent job as a lookup table. The Excel table has been changed to provide the correct lookup for each interval by adding .5 rather than 1.5 to each interval. This was change request 5419. This report has been re-run, verified to match, and resent to KPMG on 6/5/00.

Usage Data Delivery Accuracy in the Billing category for the CLEC Aggregate.

The OCN/ACNA files used by PMAP for mapping the CLEC is a manual process. There were OCNs provided in the Billing data that were not included in the OCN/ACNA mapping file for PMAP. The data associated with these OCNs represent the difference in the KPMG & BellSouth reports. The PMAP group must manually update the OCN/ACNA tables to coincide with the CLECs OCN/ACNA value reflected on the individual accounts. A process for automating this function has been addressed by the PMAP group.

BellSouth has provided KPMG with an electronic copy of the NODS_RQ Company file for October 1999 on 6/22/00. KPMG was able to replicate the BellSouth 'Total Data Packs Sent' value for October 1999.

Invoice Accuracy in the Billing category for the CLEC Aggregate.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 52

For Invoice Accuracy in the Billing Category for the CLEC Aggregate KPMG compared their calculations to the PMAP results. BellSouth used KPMG's comparisons to evaluate why the replication cannot be done on this measure. BellSouth evaluation of the data reveals that there are some OCNs and ACNAs on the BBI data that KPMG didn't include. Those OCNs / ACNAs that are not in KPMG's data are also the same ones that are not on the CLECID file in their comparison. If those OCNs / ACNAs were added into KPMG's data, the KPMG and Billing data figures would be the same. After review of the PMAP revenue amounts (and excluding the revenue amounts without OCN / ACNAs values in PMAP), the difference is that PMAP used the absolute value of the total billed revenue for UNE and Interconnection.

On 6/22/00 KPMG requested a copy of the rerun results for October 99 data for Invoice Accuracy. BellSouth provided KPMG with an electronic copy of the NODS_RQ Company file for October 1999 on 6/22/00.

The differences in the data that Billing reported versus the figures that PMAP reported were due to the PMAP handling of the negative revenues and the fact that the October 1999 NODS_RQ Company file did not include some of the test accounts or ICOs. If KPMG excludes the fall out of the test accounts and ICOs from the totals, the results would be the same as reported in PMAP. In summary, if 'fallout' from PMAP is determined to be 'BST test data' or BST accounts that have not been identified as a valid CLEC, PMAP will exclude it from the final reports.

Mean Time to Deliver Invoices in the Billing category for the CLEC Aggregate.

The OCN/ACNA files used by PMAP for mapping the CLEC is a manual process. There were ACNAs provided in the Billing data that were not included in the OCN/ACNA mapping file for PMAP. The data associated with these ACNAs represent the difference in the KPMG & BellSouth PMAP reports. The PMAP group must manually update the OCN/ACNA tables to coincide with the CLECs OCN/ACNA value reflected on the individual accounts. A process for automating this function has been addressed by the PMAP group.

The *Mean Time to Deliver Invoices in the Billing category for the CLEC Aggregate* report was rerun for October 1999 after the 2 ACNAs/OCNs into the NODS_RQ Company file for October 1999. The report was provided to KPMG on 6/22/00. KPMG verified that the *Mean Time to Deliver CABS Bills* value for the Interconnection type of service matched the BellSouth reported value.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 89



August 21, 2000

EXCEPTION REPORT

An exception has been identified as a result of the activities associated with the Metrics Data Integrity Verification and Validation Test (PMR-4).

Exception:

Raw data¹ used in the calculation of BellSouth Service Quality Measurement (SQM) reports are not accurately derived from or supported by their component early-stage data².

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.³

As part of the BellSouth-Georgia OSS Evaluation, KPMG is validating the integrity of the raw data used in the calculation of SQM values reported by BellSouth. KPMG conducts this validation by reviewing: (a) the accuracy of the data (by comparing a sample of raw data values with their early-stage counterparts); and (b) the completeness of the data (by analyzing whether a consecutive block of early-stage data is entirely accounted for in the raw data).

In the cases where a raw data field used to calculate the SQMs is a derived field, KPMG uses BellSouth's instructions to validate that the derived field was correctly calculated from the data components.

For the SQMs below, KPMG discovered discrepancies with the accuracy of BellSouth's raw data.

1. Collocation (October 1999) - *Average Response Time, Average Arrangement Time, and Percent Due Dates Missed*

Each entry in the following table details an individual record for which the early-stage data values and raw data values did not match for the particular field.

¹ Raw Data refers to the data used to calculate and validate the SQMs reported on the PMAP Web site.

² Early-stage data refers to the data that is extracted from BellSouth's various source systems. Early-stage data is processed into the raw data. Depending upon the SQM, the raw data are used either to generate the SQM report directly, or to validate calculations of the SQM values performed by other systems.

³ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) Web site.

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Field Name	Early-Stage Data Value	Raw Data Value
AUG/EXCLUDE	A	Not marked
FIRM ORDER RECEIVED	10/19/99	10/20/99
FIRM ORDER RECEIVED	7/26/99	7/27/99
FIRM ORDER RECEIVED	7/13/99	7/12/99
BONAFIDE APPLICATION RECEIPT	9/29/99	10/4/99
SPACE AVAILABLE TO CLEC	10/2/99	10/15/99

2. Trunking (September 1999) – *Trunk Group Service Report (Percentage of Trunks Blocked Over a One-Month Period)*

The BellSouth-reported derived raw data values for OBSVD_BLK (percentage of trunks blocked over a one-month period) did not agree with the values calculated by KPMG using the instructions BellSouth provided. BellSouth's derived raw data values and KPMG's calculated values were based on the same early-stage data.

The table below lists the BellSouth-reported derived raw data values and the KPMG-calculated values for this SQM.

TGSN	BellSouth-Reported Derived Raw Data Values	KPMG-Calculated Values
AC158303	11.36%	7.83%
AC151325	9.55%	23.31%
AC189333	20.04%	21.49%
AC198084	6.11%	7.21%
AC199608	0.00%	1.25%
AC202703	0.53%	0.65%
AC203042	0.00%	0.01%
AC203657	3.94%	3.95%
AC204674	0.01%	0.04%
AC204913	0.00%	0.08%
AC205420	0.02%	0.06%
AC206974	2.23%	2.30%
AC208035	0.00%	0.02%
AC208787	0.01%	0.06%
AC213664	0.18%	0.24%
AC205717	0.19%	0.33%
AC212373	40.21%	46.21%

3. Pre-Ordering (January 26 to 30, 2000)⁴ – *OSS Response Interval for CLECs*

⁴ These discrepancies were found for the HALCRIS system on the LENS server.

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Each entry in the following table details an individual record for which the early-stage data values and raw data values did not match for the particular field.

Field Name	Early-Stage Data Value	Raw Data Value
Total number of accesses (NUM_TOTAL)	17,621	17,608
Total number of accesses (NUM_TOTAL)	22,448	22,446
Total number of accesses (NUM_TOTAL)	46,060	46,059
Total number of accesses (NUM_TOTAL)	27,196	27,178
Total number of accesses (NUM_TOTAL)	4,831	4,830
Total access time in milliseconds (MS_TOTAL)	123,489,827	123,425,722
Total access time in milliseconds (MS_TOTAL)	172,354,311	172,345,481
Total access time in milliseconds (MS_TOTAL)	470,806,049	470,800,540
Total access time in milliseconds (MS_TOTAL)	304,602,647	304,112,319
Total access time in milliseconds (MS_TOTAL)	49,453,702	49,348,092
Total number of accesses that took more than 6 seconds (HIGH_TOTAL)	7,077	7,072
Total number of accesses that took more than 6 seconds (HIGH_TOTAL)	12,001	11,993
Total number of accesses that took more than 6 seconds (HIGH_TOTAL)	1,654	1,653

4. Ordering (October 1999) – *Speed of Answer in Ordering Centers*⁵ for BellSouth Retail Business Service Centers

Each entry in the following table details an individual record for which the early-stage data values and raw data values did not match for the particular field.

Field Name	Testing Date	Early-Stage Data Value	Raw Data Value
Number of calls handled	10/18/99	1,918	1,916
Number of calls handled	10/28/99	1,586	1,589

5. Ordering (October 1999) – *Percent Rejected Service Requests, Reject Interval*

A sample record⁶ from BellSouth's raw data file was categorized as a partially mechanized order, whereas the LEO source legacy system identified the data as a mechanized order⁷.

⁵ KPMG compared raw data records with the earlier-stage data for the population of raw data records provided by BellSouth.

⁶ A record is identified by a Operating Company Number (OCN), Purchase Order Number (PON), and Version Number (VER) combination. All these fields are proprietary information.

⁷ Please note that KPMG cannot provide any more details due to the proprietary nature of the record identifier information.

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Further, the BellSouth-reported derived raw data value for REJECT_DURATION for a sample record did not agree with the value calculated by KPMG (using BellSouth's instructions.)

The following table details an individual record for which the early-stage data value and raw data value did not match for the particular field.

Field Name	Early-Stage Value	Raw Data Value
Reject Duration	43.8 hours	44 hours

6. Ordering (October 1999) – *Firm Order Confirmation Timeliness* for Trunks

KPMG received history information for a sample of raw data records from BellSouth's EXACT legacy system, both in database format and log screens. The information in the two source formats was not consistent.

In the log screens reviewed, KPMG found 14 ASRs (Access Service Requests) in a sample of 36 ASRs where the same ASR was associated with different ACNAs (Access Customer Name Abbreviations), PONs (Purchase Order Numbers), and VERs (Version Numbers)⁷.

7. Provisioning (October 1999) – *Coordinated Customer Conversions*

Two records in the raw data sample had the same ORDER number, but different DUE DATE COMPLETE values. KPMG was able to validate one of the DUE DATE COMPLETE dates against the early-stage WFA logs, but not the other.

The following table details the two records in the raw data sample with the same ORDER number, but different DUE DATE COMPLETE values.

DDCOMP	CUT START	CUT COMPLETE	Validated?
10/22/99	1332	1357	Yes
10/25/99	1332	1357	No

8. Provisioning (October 1999) – *Percent Provisioning Troubles within 30 Days of Service Order Activity*

The early-stage data from BellSouth's ICAIS/BARNEY system did not agree with the raw data values for "trouble date" field for six non-trunk service orders.

Each entry in the following table details an individual record for which the early-stage data values and raw data values did not match for the particular field.

Field Name	Early-Stage Value	Raw Data Value
Trouble Date	10/22/99	10/25/99
Trouble Date	10/7/99	10/5/99

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 89

Trouble Date	10/26/99	10/25/99
Trouble Date	10/11/99	10/5/99
Trouble Date	10/14/99	10/17/99
Trouble Date	10/7/99	10/1/99

9. Provisioning (October 1999) – *Held Order Interval for Trunks, Order Completion Interval and Distribution.*

The early-stage date from BellSouth's ICAIS/BARNEY system did not agree with the raw data values for the: (a) "so_missed_cmtt_cd" field (used to derive the appointment reason dimension) for five trunk service orders in the raw data file "Held Order Interval for Trunks"; and (b) "status" field for 17 service orders in the raw data files "Held Order Interval for Trunks & Non-Trunks, and Order Completion Interval and Distribution".

Each entry in the following table details an individual record for which the early-stage data values and raw data values did not match for the particular field.

Field Name	Early-Stage Value	Raw Data Value
So missed cmtt cd	SR	NL
So missed cmtt cd	CS	NL
So missed cmtt cd	CD	NL
So missed cmtt cd	CD	NL
So missed cmtt cd	SP	NL
Status	CA	PD
Status	CA	PD
Status	PC	MA
Status	PC	AO
Status	CA	MA
Status	CA	AO
Status	CA	MA
Status	CP	MA
Status	CP	MA
Status	PD	CP
Status	PD	CP
Status	PD	CP
Status	PD	CP
Status	PD	CP
Status	PC	CP
Status	PC	CP
Status	PC	CP

10. Billing (October 1999) – *Invoice Accuracy for the CLEC aggregate*

The early-stage data showed that the records of type "16x," which should have been excluded from the calculation of *Total Billed Revenues* (per documentation provided by BellSouth), were not excluded.

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11. Billing (January 2000) – *Mean Time to Deliver Invoices* for CLECs (CABS)

The raw data value for the MAILED DATE field for one billing account in the 1/25/00 billing period (from a sample consisting of 3 ACNAs and 3 OCNS, where each ACNA and OCN is associated with more than one billing account number) did not match the corresponding early-stage data from the CSR Verification Reports⁸.

KPMG calculated a value of the “number of calendar days” using BellSouth’s provided instructions and the MAILED DATE early-stage data value from CSR Verification Reports. KPMG’s calculated value did not match BellSouth’s reported value.

Field Name	KPMG-Calculated Value	BellSouth-Reported Value
Number of Calendar Days	3 days	6 days

Impact

CLECs rely on BellSouth’s performance measurements to assess the quality of service provided by BellSouth and to plan future business activities. If the data from which SQMs are calculated is not reliable, the accuracy of BellSouth-reported SQM values may be in question. Without accurate SQMs, CLECs are unable to assess the quality of service received or plan for future business activities reliably.

BellSouth Response

1. Collocation (October 1999) - *Average Response Time, Average Arrangement Time, and Percent Due Dates Missed*

Field Name	Early-Stage Data Value	Raw Data Value	Reference No.	Correct Value
AUG/EXCLUDE	A	Not marked	ATLNGAEP-ATX-01	A
FIRM ORDER RECEIVED	10/19/99	10/20/99	LLBNGAMA-NVE-02	10/19/99
FIRM ORDER RECEIVED	7/26/99	7/27/99	SMYRGAMAPF-01-HGA	7/26/99
FIRM ORDER RECEIVED	7/13/99	7/12/99	ATLNGAEP-ATX-01	7/13/99
BONAFIDE APPLICATION RECEIPT	9/29/99	10/4/99	SVNHGAWB-BWI-01	9/29/99
SPACE AVAILABLE TO CLEC	10/2/99	10/15/99	SMYRGAMAPF-01-HGA	10/4/99

Collocation is a manual process for BellSouth. The discrepancies associated with the above application/order requests were due to either (1) typographical errors, or (2) documentation errors. The typographical errors were primarily caused by data being

⁸ Please note that KPMG cannot provide any more details due to the proprietary nature of the record identifier information.

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tracked on Excel spreadsheets with no built-in edit process. BellSouth is testing a web-based order interface that is designed to eliminate typographical errors as well as mitigate the errors caused by the manual preparation of these documents.

The resulting database will also serve as a collection point for tracking dates, further reducing the opportunity for human error. Tentative implementation is scheduled for late 2000.

As an additional interim step, BellSouth is using Collocation Program Managers in each state to facilitate the collocation process, by tracking dates, and removing roadblocks to completing collocation orders.

BellSouth has also modified the application distribution sheet to reflect "Bona Fide" date rather than "Certified" date to avoid confusion on manual database entry.

2. Trunking (September 1999) – *Trunk Group Service Report (Percentage of Trunks Blocked Over a One-Month Period)*

BellSouth uses in their calculation of the monthly trunk blocking percentage, the time consistent busy hour (TCBH) for each trunk group. The TCBH is the hour with the highest usage for the month. KPMG used in their calculation, the maximum blocking hour for each trunk group, which is the hour with the highest blocking percentage for the month. The field for determining time consistent busy hour is the OFFD_CCS field. The calculation is the same as the calculation used for the MEAS_BLK field.

This difference in the formula explains several of the differences in the blocking percentage derived by BellSouth and KPMG. The following table shows the hour used by BellSouth and the hour used by KPMG in their calculations, with explanations of each difference.

For trunk groups AC158303, AC 198084, and AC203657, the data provided was corrupted and unusable for replicating the trunk blocking report. The database that produced the data for the report being analyzed was discontinued in October 1999, therefore the source was not available to reproduce the data for those three trunk groups. KPMG requested to review trunk blocking data for another month and BellSouth provided January 2000 Trunking Data on 7/24/00.

Quality control of trunk blocking data is assured in two ways. First, BellSouth Practice 002-500-017BT, Issue A, July 1996, sets forth guidelines for the inclusion and exclusion of data in the trunk blocking calculation. Second, the inclusion and exclusion of data has to be approved by Director level or above and can only be executed by Network Planning and Support personnel with written approval.

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TGSN	BellSouth-Reported Derived Raw Data Values and the TCBH used in the calculation	KPMG-Calculated Values and the maximum blocking hour used in the calculation	Reason for Discrepancy
AC158303	11.36% (hour 21)	7.83% (hour 21)	The TCBH and the maximum blocking hour are the same for this group. The reason for the discrepancy is the KPMG calculation was based on a 19-day study period and the BellSouth calculation was based on a 10-day study period. We have no explanation as to why the BellSouth calculation did not include the entire study period.
AC151325	9.55% (hour 20)	23.31% (hour 21)	Different hour used.
AC189333	20.04% (hour 21)	21.49% (hour 21)	BellSouth continues to obtain the BellSouth derived percentage using the same hour as KPMG. We ask that KPMG check their calculation.
AC198084	6.11% (hour 10)	7.21% (hour 10)	The TCBH and the maximum blocking hour are the same for this group. The reason for the discrepancy is the KPMG calculation was based on a 12-day study period and the BellSouth calculation was based on a 17-day study period. The entire study period data was apparently not delivered to KPMG.
AC199608	0.00% (hour 10)	1.25% (hour 15)	Different hour used.
AC202703	0.53% (hour 10)	0.65% (hour 11)	Different hour used.
AC203042	0.00% (hour 16)	0.01% (hour 17)	Different hour used.
AC203657	3.94%	3.95%	BellSouth is not confident in the data generated for this trunk group and therefore does not feel either calculation is accurate.
AC204674	0.01% (hour 15)	0.04% (hour 11)	Different hour used.
AC204913	0.00% (hour 15)	0.08% (hour 9)	Different hour used.
AC205420	0.02% (hour 14)	0.06% (hour 15)	Different hour used.
AC206974	2.23% (hour 15)	2.30% (hour 16)	Different hour used.
AC208035	0.00% (hour 21)	0.02% (hour 1)	Different hour used.
AC208787	0.01% (hour 10)	0.06% (hour 8)	Different hour used.
AC213664	0.18% (hour 16)	0.24% (hour 15)	Different hour used.
AC205717	0.19% (hour 13)	0.33% (hour 12)	Different hour used.
AC212373	40.21% (hour 11)	46.21% (hour 10)	Different hour used.

3. Pre-Ordering (January 26 to 30, 2000)⁹ – *OSS Response Interval* for CLECs

⁹ These discrepancies were found for the HALCRIS system on the LENS server.

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The differences in the "early-stage" data and the "raw" data are due to questionable entries in the data file. Each entry in the "early stage" data that was not counted in the "raw" data contains a "Processing site dequeue time" that is listed as a negative number that is less than 10,000,000 milliseconds. BellSouth is currently debugging the code to determine how the **TRAN TIME** 'value' is being calculated as a negative number. Since the program that generates the "raw" data expects spaces to lie between each field, and since this massive number leaves no space between itself and the preceding field, these rows are rejected.

BellSouth has investigated the issue of the negative transaction times in the Navigator debug facility. Using a utility called 'navswim', BellSouth traced the **TRAN TIME** calculation back to a file in one of Navigator's libraries. The logic in this file is incorrect. The dequeue time was occasionally being computed incorrectly, affecting the SNA time, and ultimately affecting the calculation of the transaction time. The logic has been changed to correct the problem, has been checked into the CMVC, and will be included in the next Navigator release. The last Navigator release (Rls. 4.6.2) was made available on July 10, 2000. The next Navigator release is currently being scheduled for 4Q2000.

4. Ordering (October 1999) – *Speed of Answer in Ordering Centers*¹⁰ for BellSouth Retail Business Service Centers

The early stage data value in question for these dates, 2 calls missed in ALM and 3 calls missed in FL, were the result of human error. The calculation of adding alternate option calls manually to the switch data is currently being reviewed. BellSouth began the alternate option process in October 1999 which has resulted in a very low number of missed calls.

BellSouth is in the process of cutting each GEO in the region to the new G3 switch. As BellSouth converts GEO by GEO to the new switch, there is a method to retrieve alternate option calls separately from the NCO (Calls Offered) data. After the last cutover is completed, in Florida on September 26th, BellSouth plans to eliminate the manual process and begin tracking alternate option data separately on a regionwide basis. This process change will enhance quality control by reducing the need for manual additions. Therefore, additional review of the data could be performed beginning with the October 1st 2000 data.

5. Ordering (October 1999) – *Percent Rejected Service Requests, Reject Interval*

1) Record 1: cc = '7574' and pon = '26017' ver = 0

The LEO source system data identifies the LSR as Mechanized (LSR.manual_code = 'MECH') because the LSR was electronically submitted through LENS (LSR.system_init_id = 'WEB'). A manual code indicating Mechanized does not preclude an LSR from being a Partially Mechanized LSR. Partially Mechanized LSRs

¹⁰ KPMG compared raw data records with the earlier-stage data for the population of raw data records provided by BellSouth.

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are any electronically submitted LSR requiring manual handling. An LSR presence in LON is evidence of manual handling; thus, any LSR with a PON that can be found in both systems, LEO and LON, is reclassified as a Partially mechanized LSR.

2) Record 2: cc = '7727' and pon = 'DLT99BRS15076N' ver = 1

The reject duration for Partially Mechanized LSRs that are Manually Claimed Rejects is the interval between the timestamp when the AUDIT.notes contain the string 'Claimed By' and the time when an LSR is created in LEO. For this LSR the interval would indeed be 43.8 as reported in the Early Stage value (PMAP raw data) for each instance of this LSR.

Two additional sample LSR's provided by KPMG are in the table below.

SOURCE	OCN	PON	VER	RQ ID
STAG_LSR	7574	1001JM-1	1	8725
STAG_LSR	4110	G101011-D10	0	169020

According to the explanation previously provided, KPMG has claimed that the two following records (LSRs) should have been reclassified as "Partially Mechanized". The explanation previously provided was incomplete and did include all the criteria required for reclassification from "Mechanized" into "Partially Mechanized".

In order for PMAP to reclassify a record as "Partially Mechanized", the record must adhere to one of the following three groups of criteria (All the conditions within each group must all be true for the record to classified as "Partially Mechanized"):

- 1)
 - a) It must be a FOC LSR. FOC LSR's must contain the string "FOC STAGED FOR LSR" in the NOTES field of STAG_AUDIT (LEO)
 - b) Must contain "Claimed By" or "CLAIMED BY" in NOTES field of STAG_AUDIT (LEO)
 - c) The first three characters of SIGNOUT_CUID are not 'DB0' in STAG_LSR (LEO)
- 2)
 - a) It must be a REJECTED LSR. A REJECTED LSR contains the string "CLARIFICATION RETURNED" in the NOTES field of STAG_AUDIT (LEO)
 - b) LSR must have been manually claimed. This is true when the string "CLAIMED BY" or "Claimed By" is found in the Notes field of STAG_AUDIT (LEO).
 - c) The first three characters of SIGNOUT_CUID are not 'DB0' in STAG_LSR (LEO)
- 3.)
 - a) Records must be manually rejected after they were received in LEO. This is true when the

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 89

FIRST_CLAR_DT in STAG_LON is greater than CREATE_TS in LEO.

- b) The record must contain the string "Claimed By", or "CLAIMED BY" in Notes field of STAG_AUDIT (LEO)
- c) Purchase Order Number (PON) must be found in STAG_LON_COPY (LON)
- d) The first three characters of SIGNOUT_CUID are not 'DB0' in STAG_LSR (LEO)

3) Record 2: cc = '7727' and pon = 'DLT99BRS15076N' ver = 1

The reject duration for Partially Mechanized LSRs that are Manually Claimed Rejects is the interval between the timestamp when the AUDIT.notes contain the string 'Claimed By' and the time when an LSR is created in LEO. For this LSR the interval would indeed be 43.8 as reported in the Early Stage value (PMAP raw data) for each instance of this LSR.

An LSR can have multiple "audit notes" entries. Each entry would have its own date/time stamp.

The date and time of the rejection is the notes timestamp from the STAG_AUDIT_TABLE if the LSR reads either "CLAIMED BY" or Claimed By" in the audit notes field and all of the following are true of the LSR:

- It was electronically submitted
- It was manually rejected
- It's Purchase Order Number (PON) exists in LON
- It has not been cancelled prior to being rejected or clarified
- The LON system first clarification date/time is greater than the date/time it was first submitted electronically.

If any of the audit notes field reads either "CLAIMED BY" or Claimed By" and any of the other above requirements are not met, the reject date and time would be the notes timestamp from STAG_AUDIT_TBL where "CLARIFICATIONS RETURNED" appears in the audit notes field.

Additional data was provided to KPMG on 7/27/00 to support the explanation of this Exception.

6. Ordering (October 1999) – *Firm Order Confirmation Timeliness* for Trunks

KPMG found duplicate PONs because the number sequence for an ASR can be duplicated in each of five sites. The sites are:

CAT – NC / SC
GAT – GA
NFT – North FL
SFT – South FL
IOA – AL, TN, KY, LA, MS

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 92



August 11, 2000

EXCEPTION REPORT

An exception has been identified as a result of the activities associated with the Metrics Data Integrity Verification and Validation Test (PMR-4).

Exception:

BellSouth's raw data¹ used in the calculation of the BellSouth Service Quality Measurement (SQM) reports are not accurately derived from or supported by their component early-stage data².

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the State of Georgia. BellSouth also publishes the monthly raw data used to create these reports.³

As part of the BellSouth-Georgia OSS Evaluation, KPMG is validating the integrity of the raw data used in the calculation of SQM values reported by BellSouth. KPMG conducts this validation by reviewing: (a) the accuracy of the raw data (by comparing a sample of raw data values with their early-stage counterparts); and (b) the completeness of the raw data (by analyzing whether a consecutive block of early-stage data is entirely accounted for in the raw data).

For the SQMs below, KPMG discovered discrepancies with the completeness of the raw data.

1. Pre-Ordering (October 1999, and January 2000)⁴ – *Average OSS Response Time and Response Interval* for CLEC aggregate

The raw data file used to calculate the *Average OSS Response Time and Response Interval* does not contain the response data from the TAG system for 10/06/1999, 10/24/1999, 10/25/1999, 10/28/1999, 01/16/2000, and 01/31/2000.

¹ Raw Data refers to the data used to calculate and validate the SQMs reported on the PMAP Web site.

² Early-stage data refers to the data that is extracted from BellSouth's various source systems. Early-stage data is processed into the raw data. Depending upon the SQM, the raw data are used either to generate the SQM report directly, or to validate calculations of the SQM values performed by other systems.

³ These reports and raw data may be delivered in hard copy or via the Performance Measurement and Analysis Platform (PMAP) Web site.

⁴ October 1999 was the initial test month for the Performance Measurements Test. However, due to issues with the daily response feeds for October 1999, KPMG used January 2000 as the test month for this SQM.

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2. Pre-Ordering (December 1999) – *OSS Interface Availability*

The raw data file used for the calculation of the SQM under consideration:

- did not list any outages for the component SL13GTWY, whereas the earlier data listed outages on 12/19/99 and 12/22/99.
- listed component SL13GTWY as part of the LEO-EDI model/version, whereas the earlier data listed it as a part of the ENCORE model/version.

3. Ordering (October 1999) – *Firm Order Confirmation Timeliness* for Trunks

None of the selected early stage data (25 records) from the EXACT system could be found in the raw data. Each of the selected ASRs (Access Service Requests) could be found in the raw data, but the associated ACNA (Access Customer Name Abbreviation), PON (Purchase Order Number), and VER (Version Number) fields in the raw data and early stage data were different⁵.

4. Ordering (October 1999) – *Percent Rejected Service Requests, Reject Interval, Firm Order Confirmation Timeliness* for Trunks

KPMG found that two records from the LCSC Order Number (LON) source system (of a sample of 25 reviewed) did not show up in the PMAP raw data⁵.

5. Provisioning (October 1999) – *Mean Held Order and Distribution Interval, Percent Missed Installation Appointments, Average Completion Interval/Order Completion Interval Distribution, Percent Provisioning Troubles within 30 Days of Service Order Activity*

Ten of the service orders in a sample of 50 service orders from the ICAIS system, issued on October 15, 1999, did not appear in the raw data⁵.

6. Maintenance & Repair (October 1999) – *Missed Repair Appointments, Customer Trouble Report Rate, Maintenance Average Duration, Percent Repeat Troubles within 30 days, Out of Service for greater than 24 hours*

Five trouble tickets in a sample of 50 trouble tickets from the LMOS and WFA systems, opened on October 15, 1999, did not appear in the raw data⁵.

7. Maintenance & Repair (December 1999) – *OSS Interface Availability*

The raw data file used for the calculation of this SQM did not list the component MRLM53BM, whereas the early stage data listed the component as a part of LMOS-

⁵ Please note that KPMG has not provided any additional details due to the proprietary nature of the record identifier information.

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This issue was corrected on 7/10/00 by moving the TAG data feed to a new directory. The new directory contains over 4 gigabytes of free space, thus eliminating the issue of capacity on the TAG server.

2. Pre-Ordering (December 1999) – *OSS Interface Availability*

During normal operations activities, BellSouth discovered an omission of problem records related to SL13GTWY (LEO-EDI). Corrections were made to the database in March 2000. As a result there is a discrepancy in outage reporting for the LEO-EDI application components between September 1999 and February 2000. Additionally, there are two BSIS (MARCH) records included in this report that were not included in the January OSS Interface Availability 302 Report.

KPMG found that the Raw Data from December was incomplete. KPMG issued another raw data request for the same Pre-Ordering *OSS Interface Availability* to review March 2000. KPMG reviewed March 2000 raw data for the same Pre-Ordering *OSS Interface Availability* and did not find any discrepancies.

3. Ordering (October 1999) – *Firm Order Confirmation Timeliness* for Trunks

Only one of the 25 ASRs provided to KPMG is a valid Local Access Message Trunk.

Local Trunks are identified by:

Reqtyp[1,1] = 'M' and

ECCKT[12,1] = 'J' (ECCKT[12,1] = TRKMOD[1,1])

Item 16, ASR = 9928800124 PON = A473 is the only one that meets the Local Trunk criteria. This ASR is not loaded into the PMAP system because it fails to meet criteria - Date Confirmed (D_CNF) is greater than Date Received (D_REC). Date variables "D_REC" & "D_CNF" do not include time, only month, day and year. Because it is not loaded into PMAP, it's not included in the Raw Data provided by PMAP.

Item 20, ASR = 9928800124 PON = 04269123-D9998 is not a valid Local Trunk. It is included in the Early Stage Data (PMAP Raw Data) due to an error in the logic. As ASR is unique within an EXACT Site. EXACT% Source Data is extracted as two tables, STAG_EXACT_SEG1 and STAG_EXACT_SEG2. These two tables are currently joined using ASR. Both tables contain ASRs from all 5 EXACT Sites

Change Request 5928 was submitted on 6/21/00 to assure BST captures and reports correct data for each ASR in the future. It is scheduled to be worked with June data to be posted to the Web in July.

4. Ordering (October 1999) – *Percent Rejected Service Requests, Reject Interval, Firm Order Confirmation Timeliness* for Trunks

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 92

BellSouth's response is broken into two individual responses for each record in question. Record identifier information that was provided to BellSouth by KPMG is also included for each record.

Record #1

Record	LON	OCN	PON	VER
1	2816098	7050	20-00039790A	0

This record is not in the PMAP database because certain selection criteria are not met. As certain selection criteria were not met, this record will not be stored in PMAP and will be diverted to a temporary error table. This record is not included in raw data because it is not stored in PMAP.

The text shown below in *italics* lists the selection criteria that caused this particular record to fall out to an error table. The table immediately following the italicized text shows partial detail about this particular record and includes the reasons that caused each field in the record to error out.

*IF (SUP = 1 and IsNull(FIRST_CLAR_DT)) Then 0 Else 1
and (
((FIRST_RCVD > '01-Jan-1997') AND (isnull(FOC_DATE)))
or
(not(isnull(FOC_DATE)) and (LAST_RCVD < FOC_DATE) and
isnull(FIRST_CLAR_DT))
or
(not(isnull(FIRST_CLAR_DT)) and (FIRST_RCVD < FIRST_CLAR_DT)))*

Field Name	Field Value	Error Description
first_rcvd	1999-10-15 10:49	Only include LSR's that have not been Clarified or that were Clarified after the LSR was First Received
last_rcvd	1999-10-21 15:50	Only include LSR's that are not Firm Order Confirmed or that were Firm Order Confirmed after the LSR was Last Received
Foc_date	1999-10-21 15:50	Only include LSR's that are not Firm Order Confirmed or that were Firm Order Confirmed after the LSR was Last Received
first_clar_dt		Only include LSR's that have not been Clarified or that were Clarified after the LSR was First Received

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 92

Record #2

Record LON OCN PON VE
 R

2 2816295 7268 W192
 99

The OCN of '7268' is not a valid OCN number in PMAP and therefore this record fell out to an error table. Because this record is not included in the PMAP database it will not be included in raw data.

The following text references three text boxes located further down the page. Throughout the text they are referred to as boxes 1 through 3 with box 1 as the leftmost box.

The boxes below represent a breakdown of the original logic statement into smaller more manageable parts.

The leftmost box contains the original logic statement.

The second box from the left substitutes *Statement1*, *Statement2*, *Statement3*, and *Statement4* for longer statements in the first box (e.g. (*SUP = 1 and IsNull(FIRST_CLAR_DT)*) *Then 0 Else 1* becomes *Statement1*). This makes it easier to see the overall logic involved and helps to break the logic into more manageable pieces. Also in the second box *Statement2*, *Statement3* and *Statement4* are grouped together because of the location of the parentheses in the original logic statement. This means that the comparison between *Statement2*, *Statement3*, and *Statement4* will be performed before any of the other logic.

The third and final box represents the most basic form of the more complex logic from the first box. In this box *Statement5* represents the results of the comparison between *Statement2*, *Statement3*, and *Statement4* from the previous box. In order for the entire statement in the fourth box to be TRUE both *Statement1* and *Statement5* must be true. If either *Statement1* or *Statement5* is FALSE then the entire statement in the fourth box will evaluate to FALSE.

To find if the entire logic statement is TRUE or FALSE first evaluate *Statement1* using the instructions below. If *Statement1* is FALSE then there is no need to continue the evaluation because the entire original statement will be FALSE. If *Statement1* is TRUE then *Statement5* must be evaluated as discussed below.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 92

If the entire logic statement evaluates to TRUE then the associated record is kept in PMAP for further processing. If the entire logic statement evaluates to FALSE then the associated record drops out to an error table

Now that the original logic statement has been broken down into smaller more manageable pieces, each piece can be further evaluated. This next section will break down *Statement1*, and *Statement5* into their individual components.

<div>If (SUP = 1 and IsNull(FIRST_CLAR_DT)) Then 0 Else 1</div> <div>and</div> <div>((FIRST_RCVD > '01-Jan-1997') AND (isnull(FOC_DATE)))</div> <div>or</div> <div>(not(isnull(FOC_DATE)) and (LAST_RCVD < FOC_DATE) and isnull(FIRST_CLAR_DT))</div> <div>or</div> <div>(not(isnull(FIRST_CLAR_DT)) and (FIRST_RCVD < FIRST_CLAR_DT)))</div>	<div>Statement1</div> <div>and</div> <div>(Statement2 or Statement3 or Statement4)</div>	<div>Statement1</div> <div>and</div> <div>Statement5</div>
<div>If (SUP = 1 and IsNull(FIRST_CLAR_DT)) Then 0 Else 1</div> <div>and</div> <div>((FIRST_RCVD > '01-Jan-1997') AND (isnull(FOC_DATE)))</div> <div>or</div> <div>(not(isnull(FOC_DATE)) and (LAST_RCVD < FOC_DATE) and isnull(FIRST_CLAR_DT))</div> <div>or</div> <div>(not(isnull(FIRST_CLAR_DT)) and (FIRST_RCVD < FIRST_CLAR_DT)))</div>	<div>Statement1</div> <div>and</div> <div>(Statement2 or Statement3 or Statement4)</div>	<div>Statement1</div> <div>and</div> <div>Statement5</div>

Statement1

Statement1 is the same thing as (SUP = 1 and IsNull(FIRST_CLAR_DT)) Then 0 Else 1. To evaluate this statement first analyze the first part (SUP = 1 and IsNull(FIRST_CLAR_DT)). If both SUP = 1 and the field FIRST_CLAR_DT is null then this part of the statement evaluates to TRUE. If SUP does not = 1 or FIRST_CLAR_DT is not null then the first part of Statement1 will evaluate to FALSE.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 92

In Then 0 Else 1 part of Statement1 the 0 equals a value of FALSE and the 1 equals a value of TRUE. This part of Statement1 has the effect of reversing the value that was found in the first part of the statement. This second part of Statement1 can be thought of as saying 'If first part is TRUE then Statement1 is FALSE' or 'If first part is FALSE then Statement1 is TRUE'.

Statement5

Statement5 is actually a representation of the (Statement2 or Statement3 or Statement4). For Statement5 to evaluate to TRUE Statement2, Statement3, or Statement4 need to be TRUE. If any of these three statements is TRUE then all of Statement5 will be TRUE and there is no need to evaluate the rest of the statements. For Statement5 to evaluate to FALSE all three of the statements (Statement2, Statement3, and Statement4) need to be FALSE.

Statement2

Statement2 is the same thing as ((FIRST_RCVD > '01-Jan-1997') AND (isnull(FOC_DATE))). If the FIRST_RCVD date is greater then January 1, 1997 and the FOC_DATE field is null then Statement2 will evaluate to TRUE. If the FIRST_RCVD date is less then or equal to January 1, 1997 or the FOC_DATE field is not null then Statement2 will evaluate to FALSE.

Statement3

Statement3 is the same thing as (not(isnull(FOC_DATE)) and (LAST_RCVD < FOC_DATE) and is null(FIRST_CLAR_DT)). Statement3 can also be represented as Statement6 and Statement7 and Statement8. For Statement3 to be TRUE, Statement6, Statement7, and Statement7 all need to be TRUE. If any of the statements (Statement6, Statement7, or Statement8) are FLASE then Statement3 will be FALSE.

Statement4

Statement4 is the same thing as (not(isnull(FIRST_CLAR_DT)) and (FIRST_RCVD < FIRST_CLAR_DT)). If the field FIRST_CLAR_DT is not null and the FIRST_RCVD date is less then the FIRST_CLAR_DT then Statement4 will evaluate to TRUE. If the field FIRST_CLAR_DT is null or the FIRST_RCVD date is greater then or equal to FIRST_CLAR_DT then Statement4 will evaluate to FALSE.

5. Provisioning (October 1999) – *Mean Held Order and Distribution Interval, Percent Missed Installation Appointments, Average Completion Interval/Order Completion Interval Distribution, Percent Provisioning Troubles within 30 Days of Service Order Activity*

Each of these records was excluded from the raw data tables because they did not meet specific business requirements. An explanation of the specific business rule not met is included in the table below.

BELLSOUTH'S FIFTH AMENDED RESPONSE TO EXCEPTION 92

Record	SO_NBR	ISSU_DT	TEL_NUM	Discrepancy Detail	Reason for absence in Raw Data
1	CO5DT9J8	10/15/99	4043773826	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	HELD ORDER - This record is an administrative order, and therefore is not reported upon. OCI/PMI/TROUBLES WITHIN 30 DAYS - This record was cancelled. These measures only report upon completed orders.
2	CORND342	10/15/99	7705291218	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	HELD ORDER - This record is an administrative order, and therefore is not reported upon. OCI/PMI/TROUBLES WITHIN 30 DAYS - This record was cancelled. These measures only report upon completed orders.
Record	SO_NBR	ISSU_DT	TEL_NUM	Discrepancy Detail	Reason for absence in Raw Data
3	CP5DM4P2	10/15/99	7063352321	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	This is a listing order - no work performed, therefore, this is not reported on.
4	DOCRVXY4	10/15/99	7703909116	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	HELD ORDER - This record had a commitment date that was outside of the reporting period, and therefore is not considered in this month's report. OCI/PMI/TROUBLES WITHIN 30 DAYS - This record has a status of "pending". These measurements only report on completed orders.
5	DP7H54W4	10/15/99	9128245251	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	This is a listing order - no work performed, therefore, this is not reported on.
6	DPCRPD37	10/15/99	9128532415	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	This is a listing order - no work performed, therefore, this is not reported on.
7	NP4B72G6	10/15/99	7066363748	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	This is a listing order - no work performed, therefore, this is not reported on.
8	NP7497P3	10/15/99	7063353357	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	This is a listing order - no work performed, therefore, this is not reported on.
9	NP764WT6	10/15/99	9125296473	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	This is a listing order - no work performed, therefore, this is not reported on.
10	TO420Y26	10/15/99	7706508811	This SO_NBR could not be found in the PMAP raw data. KPMG received only a block of SO_NBRs on October 15, starting at 10:00 am., and therefore, cannot provide any more additional information on these records.	HELD ORDER - This record had a commitment date that was outside of the reporting period, and therefore is not considered in this month's report. OCI/PMI/TROUBLES WITHIN 30 DAYS - This record has a status of "pending". These measurements only report on completed orders.



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August 25th, 2000

RECEIVED

AUG 25 2000

Ms. Helen O'Leary
Executive Secretary
Georgia Public Service Commission
47 Trinity Avenue SW, Room 520
Atlanta, GA 30334

EXECUTIVE SECRETARY
G.P.S.C.

**RE: Investigation into Development of Electronic Interfaces for BellSouth's
Operational Support Systems; Docket No. 8354-U**

Dear Ms. O'Leary:

Enclosed please find an original and twenty-six (26) copies, as well as an electronic copy, of KPMG Consulting LLC's Exception 79 (Amended) and Exceptions 106 – 109 along with BellSouth's responses to Exceptions 106 - 109 and amended response to Exception 107 for filing in the above referenced matter.

I would appreciate your filing same and returning a copy stamped "filed" in the enclosed stamped, self-addressed envelope.

Thank you for your assistance in this regard.

Very truly yours,

David Frey
Manager

Enclosures

cc: Parties of Record



EXCEPTION 79 (Amended)
BellSouth Georgia OSS Testing Evaluation

Date: August 16, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Data Collection and Storage Verification and Validation Review (PMR-1).

Exception:

BellSouth does not have an adequate data retention policy for its early-stage data¹, the programs used to process the early-stage data, the raw data used in the calculation of the Service Quality Measurement (SQM) reports, or the computation programs used to calculate SQM report values.

Initial Exception:

BellSouth does not adequately retain certain source data used in the calculation of several Service Quality Measurement (SQM) reports that are not generated wholly or primarily by the Performance Measurement and Analysis Platform (PMAP).²

SQMs are calculated to illustrate BellSouth's Operational Support System performance. Each month, as mandated by the Georgia Public Service Commission, BellSouth publishes performance measurement reports of SQM values for the CLECs engaged in business activity with BellSouth in the state of Georgia.

Through interviews, KPMG Consulting has learned that BellSouth does not adequately retain some of the source data used in the calculation of manual SQMs. The following table shows the data in question and the associated storage duration.

Source Data System	SQM Affected	Retention Duration
Meridian Max	<i>Speed of Answer in the Ordering Center (Ordering)</i>	8 days
Renaissance Enterprise Management	<i>Interface Availability (OSS)</i>	Current month
Spectrum Automatic Call Distributor	<i>Average Speed of Answer in Ordering Centers – Residence (Ordering)</i>	60 days
Meridian Symposium	<i>Average Answer Time in Repair Centers for Large Business (Maintenance & Repair)</i>	2 days
Meridian Max	<i>Average Answer Time in Repair Centers – Residence</i>	7 days

¹ Early-stage data is the earliest instance of the data collected in the BellSouth OSS.

² These SQMs are referred to as "manual SQMs."

EXCEPTION 79 (Amended)

BellSouth Georgia OSS Testing Evaluation

	<i>(Maintenance & Repair)</i>	
QMS	<i>Average Speed to Answer - Toll (Operator Services Toll & Directory Assistance)</i>	45 days

Amendment:

On further investigation, KPMG Consulting learned that BellSouth does not have a written policy regarding retention of any early-stage data, the computer programs used to process the early-stage data, the raw data, or the SQM-generating computer programs for an adequate time period.

In KPMG Consulting's professional opinion, to facilitate a thorough audit of BellSouth's Metrics data in the future, BellSouth should retain the early-stage data, the computer programs used to process the early-stage data, the raw data and the computer programs used to create the SQM reports (along with the reports themselves) for a period of three years after the publishing of an SQM report. Retention of all of these elements is essential for a complete and accurate audit of BellSouth's SQMs.

Impact

Inadequate retention of data and the associated computer programs limits the ability of BellSouth or other parties to validate or re-generate historical SQM reports that may need to be revised, corrected, or audited.

Date: August 10, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Provisioning Verification Test (O&P-5).

Exception:

BellSouth failed to meet the agreed upon Frame Due Time (FDT) for eight loop migrations.

Background: A “coordinated Hot-Cut” (loop migration) is a synchronized process for converting an end-user’s service from one service provider (in this case BellSouth) to another. In a coordinated Hot-Cut, provisioning activities between the service providers occur in a coordinated, sequential fashion. Service is terminated by the old service provider and then immediately re-provisioned by the new service provider. In this manner, the end-user experiences little or no noticeable delay in the provisioning of the new service.

KPMG began observing Hot-Cuts (loop migration) installations on April 24, 2000. Through the course of these initial observations, KPMG documented a number of instances where Bell South demonstrated inconsistencies in their adherence to their own methods and procedures. This initial phase of observations was temporarily suspended at the request of BellSouth, so that the company could implement changes to their methods and procedures.

Testing resumed on May 15, 2000. During this phase, KPMG observed fifty-four Hot-Cut (loop migration orders). Eight of these fifty-four orders were scored “Not Satisfied” because BellSouth was unable to meet the agreed upon Frame Due Time¹ (FDT). Through this phase, BellSouth performed at a success rate of 85%. The KPMG standard for performance is 95%.

KPMG’s Observations: KPMG observed eight loop migration installation attempts during which BellSouth was unable to meet the agreed upon FDT. In each case, BellSouth accepted the CLEC’s Local Service Request (LSR) and responded with a Local Service Confirmation (LSC) and an associated due date/time.

Based on BellSouth’s response, the CLEC believed its subscriber would be provided service at the due date/time referenced in the LSC. However, on the actual cut date, BellSouth informed the CLEC that the FDT would not be met. In turn, the CLEC was

¹ “Frame Due Time” refers to the time the coordinated Hot-Cut is scheduled to occur.

EXCEPTION 106

BellSouth Georgia OSS Testing Evaluation

forced to report to its subscriber that access to the loop could not be delivered at the previously committed time.

The following table identifies CLEC loop migrations for which BellSouth did not meet the FDT.

Observation Date	Order Number	Number of Lines
5/15	60630	3
5/16	59643	7
5/25	61832	8
6/07	63715	5
6/14	59900	3
6/07	64509	3
6/13	63232	2
6/14	65202	3

Impact

BellSouth's failure to complete the loop migrations at the agreed upon FDT impacts CLECs in the following ways:

- **Decreased Customer Satisfaction.** If BellSouth cannot meet an agreed upon FDT, provisioning on a CLEC order will be delayed. Service provisioning delays will result in a decrease in CLEC end-user customer satisfaction. In some cases, CLEC customers may cancel an order, resulting in a loss of revenue for the CLEC.

Date: August 7, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Pre-Order, Order, & Provisioning xDSL Process Parity Evaluation (PO&P16).

Exception:

KPMG observes that parity does not appear to exist between the processes through which BellSouth retail (BellSouth Internet Services) and wholesale (CLEC-UNE) customers may determine the availability of ADSL capable loops.

CLEC xDSL Pre-Ordering Process Overview: BellSouth's CLEC (UNE) pre-order xDSL loop qualification process requires CLECs to submit Service Inquiries (SI) by email to the Complex Resale Services Group (CRSG) in Birmingham, Alabama. The SIs are screened and forwarded to the geographically appropriate BellSouth Service Advocacy Center (SAC). A SAC specialist uses LFACS, SOCS, RELOG, and MapViewer systems to process the SI and determine the availability of the specific xDSL loop (e.g., UDL-2W/ADSL, UDL-2W/HDSL) requested by the CLEC. If the loop is available¹, the Specialist reserves the cable pair and completes the SI. If the loop is unavailable, the SI is marked "Cannot Provide" or "Not Available but can be provided with a job." Completed SI forms are emailed back to the CRSG and the CLEC is notified of the result. The SI process takes between five to eight days to return a response to the CLEC.

BellSouth xDSL Pre-Ordering Process Overview: BellSouth retail operations do not directly provide xDSL services to end user (retail) customers. Rather, BellSouth Corporation has chosen to have BellSouth Internet Services (BellSouth.net) provide ADSL services to retail customers. BellSouth.net has, in turn, out-sourced pre-order and order processing to Client Logic, a third-party provider of call center services.

Loop qualification information is provided to BellSouth Internet Services retail and resale (e.g., ISP) customers in real-time using the BellSouth Loop Qualification System (LQS or Loopy). LQS contains loop information only on those Telephone Numbers served by Wire Centers in which BellSouth ADSL equipment has been installed and for Carrier Serving Areas (CSAs) in those Wire Centers in which a BellSouth ADSL Remote Solution has been implemented (for loops working from a Digital Loop Carrier remote site). In addition, LQS contains information for BellSouth retail POTS lines only. Customers enter their telephone number into LQS via the BellSouth.net

¹ Per the technical requirements section of the *BellSouth Unbundled Asymmetrical Digital Subscriber Line (ADSL) Compatible Loop – CLEC Information Package*, if an ADSL compatible loop is available, "it will be provided with no Digital Loop Carrier (DLC), load coils or repeaters. These loops will conform to the Revised Resistance Design (RRD) guidelines for non-loaded facilities as described in *Committee T1 Technical Report No. 28*. The loop facility will consist of a loop 18kft or less which may include 6kft of bridge tap with a resistance of 1300 ohms or less if the loop is available... ADSL loops will meet the parameters specified in *BellSouth Technical Reference 73600 (TR73600)*."

(www.fastaccess.com) Web site and receive a response immediately. Client Logic has access to LQS through the FASS system and can immediately determine the availability of ADSL capable loops. LQS also holds details of why a subscriber loop is not qualified.

Impact

The lack of parity in the xDSL pre-ordering processes impacts CLECs in the following ways:

- **Decrease in customer satisfaction and Inability to Compete Effectively.** Although BellSouth has provided several "Data Only" CLECs (DLECs) with access to LQS to facilitate line sharing, the remainder of BellSouth's CLEC-UNE customers lack access to LQS. Because parity does not appear to exist between the CLECs' manual pre-ordering process and BellSouth retail customers' pre-ordering process, CLECs are unable to compete effectively with BellSouth in offering ADSL service. The lengthy pre-ordering process increases the time needed for CLECs to determine the availability of ADSL capable loops for providing (non-BellSouth) ADSL service to their respective customers. These delays may result in a decrease in CLEC customer satisfaction.

Date: July 18, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Pre-Order, Order & Provisioning xDSL Process Parity Evaluation (PO&P16).

Exception:

Parity does not exist between BellSouth's CLEC xDSL ordering process and its retail xDSL ordering process (BellSouth Internet Services).

CLECs are required to follow a manual process to order ADSL qualified loops (e.g., email to CRSQ, printed out and faxed to LCSC for entry). By comparison, the BellSouth retail process for ordering ADSL service is mechanized, with a flow-through (i.e., do not require manual order entry by the Digital Subscriber Group (DSG)) rate of over 60%..

CLEC ADSL Ordering Process Overview: To order ADSL service a CLEC must first qualify the particular loop by emailing a Service Inquiry (SI) and a Local Service Request (LSR) form to the Complex Resale Support Group (CRSG). Once the CLEC receives confirmation that a given loop is qualified to support ADSL service, the CRSQ faxes the LSR to the Local Carrier Service Center (LCSC) for review and entry into BellSouth's Local Order Number (LON) system for tracking.

If additional information is required from the CLEC, BellSouth will fax a Clarification to the CLEC. Once BellSouth deems that the LSR is error-free, address and customer record information is then validated using the ORION/RSAG and BOCRIS systems, respectively. The LSR information is subsequently entered into the EXACT system, assigned a service order number, and submitted to the SOCS system for processing. Firm Order Confirmations (FOCs) or Clarifications are faxed to CLECs within a targeted interval of 48 hours.

BellSouth ADSL Ordering Process Overview: BellSouth retail operations do not directly provide xDSL services. BellSouth Corporation has chosen to have BellSouth Internet Services (BellSouth.net) provide ADSL services to retail customers; BellSouth.net has, in turn, out-sourced pre-order and order processing to Client Logic, a third-party provider of call center services.

A BellSouth retail customer's order for end-to-end ADSL service is entered into one of three Web front-end systems (Consumer, Small Business and FASS [used by Client Logic]) and flows through to the SOEG system and then into SOCS. Orders that fall out in the DSG for manual processing are entered into the BASS system within 24 hours of receipt. Once cleared of errors, these orders flow from SOCS to the LFACS system and then to the NMS system.

Impact

The lack of parity in the ADSL ordering processes impacts CLECs in the following ways:

- **Inability to Compete Effectively.** Because BellSouth wholesale customer orders are processed manually, CLECs a) lack the opportunity to reduce order management costs through mechanized ordering; b) are more likely to experience order errors and corresponding delays; and c) encounter slower commitment times for orders submitted.
- **Decrease in customer satisfaction.** The lengthy ordering process increases the time needed for the CLEC to provide service. This may result in a decrease in CLEC customer satisfaction.

EXCEPTION 109

BellSouth Georgia OSS Testing Evaluation

Date: August 8, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Pre-Order, Order, & Provisioning Work Center Capacity Management Evaluation – xDSL (PO&P 15).

Exception:

Formal procedures for managing the capacity of the BellSouth work centers, which perform wholesale (UNE) xDSL pre-order and ordering activities, are not defined and documented.

BellSouth supports CLEC wholesale (UNE) xDSL pre-order and order processing activity via three primary work centers: the Complex Resale Services Group (CRSG), the Service Advocate Center (SAC), and the Local Carrier Service Center (LCSC). The CRSG and SAC support pre-ordering; the LCSC supports ordering.

The aforementioned work centers do not have documented procedures in place to plan for and manage increased demands on existing manual processes for xDSL pre-order and order processing. Although several of these work centers track monthly order volumes, no evidence was found that transaction processing volume data (historical or forecasted) is used in the capacity management process. Transaction processing volumes are not currently used to calculate work center capacity/utilization, or to trigger the augmentation of center headcount and xDSL-related support processes.

Impact:

The lack of defined and documented procedures for managing the capacity of BellSouth's work centers will impact CLECs in the following ways:

- **Decrease in CLEC customer satisfaction and revenues.** BellSouth's UNE xDSL order volume increased 25-30% each month between December 1999 and March 2000. The lack of formal procedures for managing BellSouth work center capacity could lead to an inability to process CLEC pre-order and order information on a timely basis. This may result in a decrease in CLEC customer satisfaction and a decrease in service revenues. Customers that desire immediate service may choose to cancel their orders or take their business elsewhere. Increases in the service provision interval could reduce CLEC cash flow.

BELLSOUTH'S RESPONSE TO EXCEPTION 106



August 18, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Provisioning Verification Test (O&P-5).

Exception:

BellSouth failed to meet the agreed upon Frame Due Time (FDT) for eight loop migrations.

Background: A "coordinated Hot-Cut" (loop migration) is a synchronized process for converting an end-user's service from one service provider (in this case BellSouth) to another. In a coordinated Hot-Cut, provisioning activities between the service providers occur in a coordinated, sequential fashion. Service is terminated by the old service provider and then immediately re-provisioned by the new service provider. In this manner, the end-user experiences little or no noticeable delay in the provisioning of the new service.

KPMG began observing Hot-Cuts (loop migration) installations on April 24, 2000. Through the course of these initial observations, KPMG documented a number of instances where Bell South demonstrated inconsistencies in their adherence to their own methods and procedures. This initial phase of observations was temporarily suspended at the request of BellSouth, so that the company could implement changes to their methods and procedures.

Testing resumed on May 15, 2000. During this phase, KPMG observed fifty-four Hot-Cut (loop migration orders). Eight of these fifty-four orders were scored "Not Satisfied" because BellSouth was unable to meet the agreed upon Frame Due Time¹ (FDT). Through this phase, BellSouth performed at a success rate of 85%. The KPMG standard for performance is 95%.

KPMG's Observations: KPMG observed eight loop migration installation attempts during which BellSouth was unable to meet the agreed upon FDT. In each case, BellSouth accepted the CLEC's Local Service Request (LSR) and responded with a Local Service Confirmation (LSC) and an associated due date/time.

Based on BellSouth's response, the CLEC believed its subscriber would be provided service at the due date/time referenced in the LSC. However, on the actual cut date, BellSouth informed the CLEC that the FDT would not be met. In turn, the CLEC was

¹ "Frame Due Time" refers to the time the coordinated Hot-Cut is scheduled to occur.

BELLSOUTH'S RESPONSE TO EXCEPTION 106

forced to report to its subscriber that access to the loop could not be delivered at the previously committed time.

The following table identifies CLEC loop migrations for which BellSouth did not meet the FDT.

Observation Date	Order Number	Number of Lines
5/15	60630	3
5/16	59643	7
5/25	61832	8
6/07	63715	5
6/14	59900	3
6/07	64509	3
6/13	63232	2
6/14	65202	3

Impact

BellSouth's failure to complete the loop migrations at the agreed upon FDT impacts CLECs in the following ways:

- **Decreased Customer Satisfaction.** If BellSouth cannot meet an agreed upon FDT, provisioning on a CLEC order will be delayed. Service provisioning delays will result in a decrease in CLEC end-user customer satisfaction. In some cases, CLEC customers may cancel an order, resulting in a loss of revenue for the CLEC.

BellSouth Response

Observation Date	Order Number	Number of Lines	Response	Action
5/15 Agree Central Office Error	60630	3	FDT 5PM The cut was made prematurely. Cut was completed and ported prior to 5 pm	Individual Central Office Technician covered on proper procedure by supervisor on 5/16

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Observation Date	Order Number	Number of Lines	Response	Action
5/16 Disagree Order had been PF'd	59643	7	Original Due Date 5/16 FDT 10:45am Order was PF'd on due date, was never assigned to a technician for conversion due to PF condition, therefore no opportunity to make hot cut at designated time. Order status is made available to the CLEC through various web reports. Note: This order was subsequently rescheduled for 10:45 on 6/20. The technician was on site and ready to cut at 10:43, however, the order was canceled by CLEC.	No action required. There was no error in the processing of a hot cut on observation date.
5/25 Agree Central Office Issue	61832	8	FDT 8AM Central Office Technician reported tie pair conflict prior to cut time, however, the problem was not resolved until start time of 10:34am. Cut complete at 11:08am. Customer had a subsequent problem relative to incorrect service order. CLEC ordered service as Loop Start, should have been Ground Start.	Individual Central Office Technician covered on proper procedure by supervisor on 5/25
6/07 This should be counted as a failure to follow M&Ps rather than this category for hot cuts	63715	5	FDT 12:49pm Order was in error status on 6/6. Call was made to LCSC by UNEC to verify error. Duplicate circuit IDs had been incorrectly entered on order by LCSC. Order was corrected on 06-06 and due date was updated for 06-08. There was no attempt to make cut on 06-07 since the due date had been updated to 06-08. The technician was dispatched and order	LCSC error Due date updated to 6/8. No attempt on 6/7 observation date based on new due date.

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			conversion occurred at designated time on time on 06-08. CLEC was advised on 6/6 and 6/7 of delay and new date. LCSC changed date due to service order error, and CLEC was notified of new date.	
6/14 Disagree	59900	3	This PON never had a 6/14 due date per BellSouth records. Original due date was 4/28. This order was PF'd and was later subsequently dated 6/22 with 5pm FDT. The UNEC made pre-call to CLEC and was advised this order had been canceled.	No action required There was no error in the processing of a hot cut on observation date.

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Observation Date	Order Number	Number of Lines	Response	Action
6/07 Disagree Order in Clarification on due date	64509	3	This order was clarified back to CLEC prior to the observation date and later canceled.	No action required There was no error in the processing of a hot cut on observation date.
6/13 Somewhat Disagree	63232	2 (1 conversion 1 new line)	<p>FDT 4pm The Field Technician was on site prior to FDT. In provisioning the new loop, line had be re-run to customer location. Rats had chewed wire leading into the suite. CLEC was advised of delay in provisioning new loop and advised UNE technician to cut service when new line was ready.</p> <p>Actual Conversion on existing line began at 5:26pm and was complete at 5:33pm after new line problem was resolved.</p>	<p>Cut was delayed due to problem at end-user location, however, the conversion could have been made by the technician at the appointed time and he could have continued to work on the new line. In this instance, the CLEC was notified of new line delay, and said work the conversion along with the new line installation.</p> <p>Updates to the process have been written to give further instructions when working conversions and new lines on the same LSR/Order.</p>
6/14 Agree	65202	3	<p>FDT 2pm IDLK Conversion</p> <p>Outside technician delay. Conversion began at 6:00pm and was completed at 6:08pm.</p>	<p>No training or follow-up required.</p> <p>WMC/Field issue in securing a timely dispatch due to work load.</p>

BellSouth provides a Firm Order Confirmation (FOC) after a valid, error free order has been submitted by the CLEC. This order confirmation does not guarantee the date/time requested, but in most cases BellSouth is able to meet the requested time. In instances where a facility problem exists, resulting in an order being PF'd , the CLEC is provided with web reports for tracking, i.e. PF report, PON Status reports, CSOTS. The CLEC must use these reports to determine status to keep their end-user updated of potential due date jeopardies. In three of the instances above, the dates were not met due to a PF

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condition. This was not a failure in the hot cut process, but rather normal PF processes and procedures.

Based on the findings detailed above, only 3 of the nine PONs listed above should be scored as "Not Satisfied" due to the inability to meet the requested FDT. One of the nine involving an LCSC error should be counted as a failure to follow Methods and Procedures since the updated order was not re-FOC'd to the customer when the due date was updated.

There were no installation attempt made on the order that was PF'd prior to due date (PON 59643) or on another PF'd order (PON 59900) that was not due dated on the listed observation date. Additionally, there were no installation attempts on the listed observation dates on orders that were in clarification back to the CLEC (PON 64509). PON 63715 had a service order error and was subsequently updated to 6/8.

Finally, in 1 instance (PON 63232), involving a new line installation along with a conversion, the CLEC and UNEC had the option of converting 1 line at scheduled time, but CLEC advised to wait until new line installed before beginning the conversion on the existing line.

With the PF and clarification issue considered, along with the M&P adherence, BellSouth performed at a success rate of 94.5% for observed hot cut observations with a 95% target.

BELLSOUTH'S RESPONSE TO EXCEPTION 107



August 14, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Pre-Order, Order, & Provisioning xDSL Process Parity Evaluation (PO&P16).

Exception:

KPMG observes that parity does not appear to exist between the processes through which BellSouth retail (BellSouth Internet Services) and wholesale (CLEC-UNE) customers may determine the availability of ADSL capable loops.

CLEC xDSL Pre-Ordering Process Overview: BellSouth's CLEC (UNE) pre-order xDSL loop qualification process requires CLECs to submit Service Inquiries (SI) by email to the Complex Resale Services Group (CRSG) in Birmingham, Alabama. The SIs are screened and forwarded to the geographically appropriate BellSouth Service Advocacy Center (SAC). A SAC specialist uses LFACS, SOCS, RELOG, and MapViewer systems to process the SI and determine the availability of the specific xDSL loop (e.g., UDL-2W/ADSL, UDL-2W/HDSL) requested by the CLEC. If the loop is available¹, the Specialist reserves the cable pair and completes the SI. If the loop is unavailable, the SI is marked "Cannot Provide" or "Not Available but can be provided with a job." Completed SI forms are emailed back to the CRSG and the CLEC is notified of the result. The SI process takes between five to eight days to return a response to the CLEC.

BellSouth xDSL Pre-Ordering Process Overview: BellSouth retail operations do not directly provide xDSL services to end user (retail) customers. Rather, BellSouth Corporation has chosen to have BellSouth Internet Services (BellSouth.net) provide ADSL services to retail customers. BellSouth.net has, in turn, out-sourced pre-order and order processing to Client Logic, a third-party provider of call center services.

Loop qualification information is provided to BellSouth Internet Services retail and resale (e.g., ISP) customers in real-time using the BellSouth Loop Qualification System (LQS or Loopy). LQS contains loop information only on those Telephone Numbers served by Wire Centers in which BellSouth ADSL equipment has been installed and for Carrier Serving Areas (CSAs) in those Wire Centers in which a BellSouth ADSL Remote Solution has been implemented (for loops working from a Digital Loop Carrier remote site). In addition, LQS contains information for BellSouth retail POTS lines only.

¹ Per the technical requirements section of the *BellSouth Unbundled Asymmetrical Digital Subscriber Line (ADSL) Compatible Loop – CLEC Information Package*, if an ADSL compatible loop is available, "it will be provided with no Digital Loop Carrier (DLC), load coils or repeaters. These loops will conform to the Revised Resistance Design (RRD) guidelines for non-loaded facilities as described in *Committee T1 Technical Report No. 28*. The loop facility will consist of a loop 18kft or less which may include 6kft of bridge tap with a resistance of 1300 ohms or less if the loop is available... ADSL loops will meet the parameters specified in *BellSouth Technical Reference 73600 (TR73600)*."

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Customers enter their telephone number into LQS via the BellSouth.net (www.fastaccess.com) Web site and receive a response immediately. Client Logic has access to LQS through the FASS system and can immediately determine the availability of ADSL capable loops. LQS also holds details of why a subscriber loop is not qualified.

Impact

The lack of parity in the xDSL pre-ordering processes impacts CLECs in the following ways:

- **Decrease in customer satisfaction and Inability to Compete Effectively.** Although BellSouth has provided several "Data Only" CLECs (DLECs) with access to LQS to facilitate line sharing, the remainder of BellSouth's CLEC-UNE customers lack access to LQS. Because parity does not appear to exist between the CLECs' manual pre-ordering process and BellSouth retail customers' pre-ordering process, CLECs are unable to compete effectively with BellSouth in offering ADSL service. The lengthy pre-ordering process increases the time needed for CLECs to determine the availability of ADSL capable loops for providing (non-BellSouth) ADSL service to their respective customers. These delays may result in a decrease in CLEC customer satisfaction.

BellSouth's Response

End user (retail) customers submit their requests for BellSouth's ADSL service through BellSouth Intranet Services or through other Network Service Providers/ Internet Service Providers (NSPs/ISPs) such as AOL.com, Earthlink.com, and so forth. As stated above in KPMG's retail process overview, a loop qualification Yes/No response is provided to an NSP through BellSouth's LQS based on the telephone number submitted for the LQS query. In a similar manner, this same LQS Yes/No response functionality is available to all CLECs. CLECs would simply need to submit their requests through their respective NSPs. The response from LQS would inform the CLEC if the facility serving that telephone number qualifies for BellSouth's ADSL service as determined according to BellSouth's technical parameters.

In contrast to the indirect access to LQS to all CLECs by means of an NSP/ISP, LQS is also made available to two limited groups of CLEC/DLECs with direct access via pass code authorization. This provides such CLEC/DLECs with slightly more detailed information including reason codes and a brief description of non-qualification per the reason code for those occasions that a facility does not qualify for BellSouth's ADSL service. Such information has direct bearing on the service needs of these groups of CLEC/DLECs.

For one group, LQS has been modified on an interim basis to temporarily fulfill some of the CLEC/DLEC's needs specifically pertaining to line sharing. The more detailed information is of benefit to these CLEC/DLECs who seek to share the use of this facility. They have a need to understand what within the configuration of a queried facility inhibits the availability of the high spectrum portion of that loop for them to purchase line

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sharing service, thereby enabling them to offer ADSL service of their own accord to the end user at that telephone number. The second group of CLECs that have direct access to LQS are those CLECs that have signed contracts with BellSouth for its wholesale ADSL service. To reiterate though, the more detailed information is very limited in comparison to the loop data obtained through BellSouth's Loop Makeup Service.

The CLEC pre-ordering process outlined above does not pertain to a service (as for retail) but to a UNE facility. The basis of comparison is not on equal footing. For retail, the service is a BellSouth defined standard of an end-to-end service, over a BellSouth owned facility, for a BellSouth owned telephone number. For UNEs, the CLEC may change the nature of the service it provides such that it does not comport to BellSouth's technical standards; the UNE is owned by the CLEC; and the telephone number is owned by the CLEC. Furthermore, BellSouth has limited knowledge of what type of equipment the CLEC may place on that facility. BellSouth must take a different approach in provisioning this facility which affects the service inquiry process.

Lastly though, the CLEC pre-ordering process described above by KPMG only acknowledges a manual process wherein BellSouth informs the CLEC if a facility is available and qualifies as an ADSL compatible loop. BellSouth has done the work of qualification on behalf of the CLEC. If the concern of parity, however, pertains to speed of knowledge rather than the same access for CLECs to LQS as for retail, CLECs now have access to BellSouth's mechanized LMU Service which provides a near real-time response, in like fashion to LQS, with much more detailed information. Additionally, this LMU Service enables the CLEC, not BellSouth, to make its own determination of qualification. The LMU Service is also available as a manual process. This more recent service pursuant to the FCC's 319 UNE Remand Order provides CLECs with a more useful option for their pre-ordering business needs along with the same near real-time speed of response with the deployment of mechanized LMU.

In summary, for the specific and simple purpose of a retail end user or a CLEC customer knowing if a telephone number qualifies for BellSouth's ADSL service, both the retail and wholesale customers have the same access to LQS, by the same means, and both customer segments receive the same Yes/No response of qualification for BellSouth's service. Therefore, this does not present a parity concern.

BELLSOUTH'S RESPONSE TO EXCEPTION 108



August 21, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Pre-Order, Order & Provisioning xDSL Process Parity Evaluation (PO&P16).

Exception:

Parity does not exist between BellSouth's CLEC xDSL ordering process and its retail xDSL ordering process (BellSouth Internet Services).

CLECs are required to follow a manual process to order ADSL qualified loops (e.g., email to CRSG, printed out and faxed to LCSC for entry). By comparison, the BellSouth retail process for ordering ADSL service is mechanized, with a flow-through (i.e., do not require manual order entry by the Digital Subscriber Group (DSG)) rate of over 60%.

CLEC ADSL Ordering Process Overview: To order ADSL service a CLEC must first qualify the particular loop by emailing a Service Inquiry (SI) and a Local Service Request (LSR) form to the Complex Resale Support Group (CRSG). Once the CLEC receives confirmation that a given loop is qualified to support ADSL service, the CRSG faxes the LSR to the Local Carrier Service Center (LCSC) for review and entry into BellSouth's Local Order Number (LON) system for tracking.

If additional information is required from the CLEC, BellSouth will fax a Clarification to the CLEC. Once BellSouth deems that the LSR is error-free, address and customer record information is then validated using the ORION/RSAG and BOCRIS systems, respectively. The LSR information is subsequently entered into the EXACT system, assigned a service order number, and submitted to the SOCS system for processing. Firm Order Confirmations (FOCs) or Clarifications are faxed to CLECs within a targeted interval of 48 hours.

BellSouth ADSL Ordering Process Overview: BellSouth retail operations do not directly provide xDSL services. BellSouth Corporation has chosen to have BellSouth Internet Services (BellSouth.net) provide ADSL services to retail customers; BellSouth.net has, in turn, out-sourced pre-order and order processing to Client Logic, a third-party provider of call center services.

A BellSouth retail customer's order for end-to-end ADSL service is entered into one of three Web front-end systems (Consumer, Small Business and FASS [used by Client Logic]) and flows through to the SOEG system and then into SOCS. Orders that fall out in the DSG for manual processing are entered into the BASS system within 24 hours of

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receipt. Once cleared of errors, these orders flow from SOCS to the LFACS system and then to the NMS system.

Impact

The lack of parity in the ADSL ordering processes impacts CLECs in the following ways:

- **Inability to Compete Effectively.** Because BellSouth wholesale customer orders are processed manually, CLECs a) lack the opportunity to reduce order management costs through mechanized ordering; b) are more likely to experience order errors and corresponding delays; and c) encounter slower commitment times for orders submitted.
- **Decrease in customer satisfaction.** The lengthy ordering process increases the time needed for the CLEC to provide service. This may result in a decrease in CLEC customer satisfaction.

BellSouth's Response

This exception finding report pertaining to the ordering of BellSouth's xDSL compatible facilities will be remedied with full production and availability to CLECs by the end of September, 2000. This ordering functionality has already been loaded onto BellSouth's systems and is currently undergoing beta testing.

As a note of clarification: In discussing the CLEC ordering process, KPMG includes the function of submitting a Service Inquiry as part of the *ordering* process. This function is pre-ordering in nature; the point when the CRSG faxes the LSR to the LCSC commences the ordering portion of the provisioning process. BellSouth has addressed pre-ordering functions in the response to KPMG's draft exception 128.

BELLSOUTH'S RESPONSE TO EXCEPTION 109



August 18, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Pre-Order, Order, & Provisioning Work Center Capacity Management Evaluation – xDSL (PO&P 15).

Exception:

Formal procedures for managing the capacity of the BellSouth work centers, which perform wholesale (UNE) xDSL pre-order and ordering activities, are not defined and documented.

BellSouth supports CLEC wholesale (UNE) xDSL pre-order and order processing activity via three primary work centers: the Complex Resale Services Group (CRSG), the Service Advocate Center (SAC), and the Local Carrier Service Center (LCSC). The CRSG and SAC support pre-ordering; the LCSC supports ordering.

The aforementioned work centers do not have documented procedures in place to plan for and manage increased demands on existing manual processes for xDSL pre-order and order processing. Although several of these work centers track monthly order volumes, no evidence was found that transaction processing volume data (historical or forecasted) is used in the capacity management process. Transaction processing volumes are not currently used to calculate work center capacity/utilization, or to trigger the augmentation of center headcount and xDSL-related support processes.

Impact:

The lack of defined and documented procedures for managing the capacity of BellSouth's work centers will impact CLECs in the following ways:

- **Decrease in CLEC customer satisfaction and revenues.** BellSouth's UNE xDSL order volume increased 25-30% each month between December 1999 and March 2000. The lack of formal procedures for managing BellSouth work center capacity could lead to an inability to process CLEC pre-order and order information on a timely basis. This may result in a decrease in CLEC customer satisfaction and a decrease in service revenues. Customers that desire immediate service may choose to cancel their orders or take their business elsewhere. Increases in the service provision interval could reduce CLEC cash flow.

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BellSouth Response

The CSRG has documented procedures for managing increased demands on existing manual processes for xDSL pre-order requests. The CSRG monitors on a monthly basis the order volume from the CLECs, as well as the forecasts received quarterly from BellSouth Account Teams, and adjusts headcount accordingly. Subsequent to the receipt of the Exception, BellSouth provided KPMG a copy of the process being used to manage work center resources.

KPMG has been provided the forecast issued in 4Q99 from which the LCSC and UNEC/BRMC force sizing plan estimates for 2000 and beyond have been driven. Please note that the ADSL/HDSL volumes represent a small proportion of the overall UNE volumes for 2000 & 2001 (2.4% & 4.8%, respectively). For force sizing purposes, xDSL loops are considered as any other UNE product, even though in the LCSC much of the pre-ordering and ordering activity is completed before the xDSL request reaches the LCSC.

By using this assumption BellSouth should have adequate staff to cover xDSL even if actual volumes are somewhat higher than the forecast. No particular or customized force modeling is done to differentiate xDSL products from other work that comes in to the centers. If, in the future, it is deemed appropriate to make such distinctions, the force model(s) will be revised accordingly.

The Service Advocate Center, SAC, has a documented procedure in place to plan for and manage increased demands for xDSL orders. All SACs have the option of documenting their increased work volume and providing such data to the local management team for additional headcount authorization. In certain locations, headcount modifications have been implemented.

The main reason for establishment of the SAC was to handle "held" orders. These type orders are orders for which we presently do not have either available or compatible facilities. Additionally, the SAC is also responsible for performing certain pre-ordering functions in the form of service inquiries of which xDSL is just one type.

The initial formula for sizing the SAC is documented in RL 96 12 026 BT, which has been provided to KPMG as a separate document, along with the formula used for staffing the SACS. RL 96 12 026 BT authorized the SACs on a regional basis and outlined their expected duties. After field visits to all of the SACs in 1998, the formula was revised December, 1998 to account for additional functions not originally incorporated.

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 107



August 18, 2000

EXCEPTION REPORT

An exception has been identified as a result of the Pre-Order, Order, & Provisioning xDSL Process Parity Evaluation (PO&P16).

Exception:

KPMG observes that parity does not appear to exist between the processes through which BellSouth retail (BellSouth Internet Services) and wholesale (CLEC-UNE) customers may determine the availability of ADSL capable loops.

CLEC xDSL Pre-Ordering Process Overview: BellSouth's CLEC (UNE) pre-order xDSL loop qualification process requires CLECs to submit Service Inquiries (SI) by email to the Complex Resale Services Group (CRSG) in Birmingham, Alabama. The SIs are screened and forwarded to the geographically appropriate BellSouth Service Advocacy Center (SAC). A SAC specialist uses LFACS, SOCS, RELOG, and MapViewer systems to process the SI and determine the availability of the specific xDSL loop (e.g., UDL-2W/ADSL, UDL-2W/HDSL) requested by the CLEC. If the loop is available¹, the Specialist reserves the cable pair and completes the SI. If the loop is unavailable, the SI is marked "Cannot Provide" or "Not Available but can be provided with a job." Completed SI forms are emailed back to the CRSG and the CLEC is notified of the result. The SI process takes between five to eight days to return a response to the CLEC.

BellSouth xDSL Pre-Ordering Process Overview: BellSouth retail operations do not directly provide xDSL services to end user (retail) customers. Rather, BellSouth Corporation has chosen to have BellSouth Internet Services (BellSouth.net) provide ADSL services to retail customers. BellSouth.net has, in turn, out-sourced pre-order and order processing to Client Logic, a third-party provider of call center services.

Loop qualification information is provided to BellSouth Internet Services retail and resale (e.g., ISP) customers in real-time using the BellSouth Loop Qualification System (LQS or Loopy). LQS contains loop information only on those Telephone Numbers served by Wire Centers in which BellSouth ADSL equipment has been installed and for Carrier Serving Areas (CSAs) in those Wire Centers in which a BellSouth ADSL Remote Solution has been implemented (for loops working from a Digital Loop Carrier remote site). In addition, LQS contains information for BellSouth retail POTS lines only.

¹ Per the technical requirements section of the *BellSouth Unbundled Asymmetrical Digital Subscriber Line (ADSL) Compatible Loop – CLEC Information Package*, if an ADSL compatible loop is available, "it will be provided with no Digital Loop Carrier (DLC), load coils or repeaters. These loops will conform to the Revised Resistance Design (RRD) guidelines for non-loaded facilities as described in *Committee T1 Technical Report No. 28*. The loop facility will consist of a loop 18kft or less which may include 6kft of bridge tap with a resistance of 1300 ohms or less if the loop is available... ADSL loops will meet the parameters specified in *BellSouth Technical Reference 73600 (TR73600)*."

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 107

Customers enter their telephone number into LQS via the BellSouth.net (www.fastaccess.com) Web site and receive a response immediately. Client Logic has access to LQS through the FASS system and can immediately determine the availability of ADSL capable loops. LQS also holds details of why a subscriber loop is not qualified.

Impact

The lack of parity in the xDSL pre-ordering processes impacts CLECs in the following ways:

- **Decrease in customer satisfaction and Inability to Compete Effectively.** Although BellSouth has provided several "Data Only" CLECs (DLECs) with access to LQS to facilitate line sharing, the remainder of BellSouth's CLEC-UNE customers lack access to LQS. Because parity does not appear to exist between the CLECs' manual pre-ordering process and BellSouth retail customers' pre-ordering process, CLECs are unable to compete effectively with BellSouth in offering ADSL service. The lengthy pre-ordering process increases the time needed for CLECs to determine the availability of ADSL capable loops for providing (non-BellSouth) ADSL service to their respective customers. These delays may result in a decrease in CLEC customer satisfaction.

BellSouth's Response

BellSouth.net provides xDSL service over the high frequency portion of an end user (retail) customer's existing facility. The end user submits its request for BellSouth's ADSL service through BellSouth.net (or through other Network Service Providers/ Internet Service Providers (NSPs/ISPs) such as Telocity.com and Earthlink.com). And as stated above, a loop qualification Yes/No response to BellSouth's ADSL Service is provided to the NSP through BellSouth's LQS.

LQS provides the same Yes/No response to those DLECs/CLECs ("D/CLEC") who also wish to utilize the high frequency spectrum of end user's facility in order to provide the D/CLEC defined version of xDSL service through line sharing. Additionally, D/CLECs have direct access to *more detailed information* in LQS which enables them to determine if the facility currently providing BellSouth voice service can support the line sharing D/CLEC's definition of xDSL service over the high frequency spectrum of the loop. Such determination is solely at the discretion of the line sharing D/CLEC based upon its technical parameters for the xDSL service that it wishes to offer. (Please note that the basic Yes/No response functionality is available to all CLECs.)

In short, LQS affords pre-ordering parity to D/CLECs who wish to utilize the high frequency spectrum of end user's facilities to provide a D/CLEC defined xDSL service.

As previously explained in the first response version to this Exception Report 128, the "CLEC xDSL Pre-Ordering Process Overview" pertains only to the purchase of an *entire* unbundled loop or sub-loop facility and does not apply to the use of the high frequency

BELLSOUTH'S AMENDED RESPONSE TO EXCEPTION 107

portion of an existing service facility. The basis of comparison between CLEC and retail processes is not on equal footing. For retail, the service is a BellSouth defined standard of an end-to-end service, over a BellSouth owned facility, for a BellSouth owned telephone number. For UNEs, the CLEC may change the nature of the service it provides such that it does not comport to BellSouth's technical standards; the UNE is owned by the CLEC; and the telephone number is owned by the CLEC. Furthermore, the CLEC may place any type of equipment it wishes on that CLEC owned facility.

As a point of clarification, the "CLEC xDSL Pre-Ordering Process Overview" described by KPMG only acknowledges a manual process wherein BellSouth informs the CLEC if a facility is available and qualifies the facility as an ADSL compatible unbundled loop. In this scenario, BellSouth qualifies the loop against the pre-defined technical parameters for an "ADSL compatible loop". Effective August 12th, CLECs also have access to BellSouth's mechanized Loop Makeup ("LMU") Service wherein the return of LMU data enables the CLEC to make its own qualification determination based upon the service it wishes to provide. Mechanized LMU provides a near real-time response, in like fashion to LQS, with much more detailed information than LQS.

CERTIFICATE OF SERVICE

Docket No. 8354-U

This is to certify that I have this day served a copy of the within and foregoing, upon known parties of record, by depositing same in the United States Mail with adequate postage affixed thereto, properly addressed as follows:

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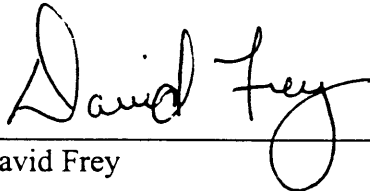
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